



Commonwealth of Massachusetts
**DEPARTMENT OF HOUSING &
COMMUNITY DEVELOPMENT**

Jane Swift, Governor ♦ Jane Wallis Gumble, Director

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Commonwealth of Massachusetts

COMMUNITY SERVICES BLOCK GRANT

AND

**COMMUNITY FOOD AND NUTRITION
PROGRAM**

Consolidated State Plan and Application

Fiscal Years 2003 – 2004

Administered by the
Bureau of Neighborhoods
Division of Neighborhood Services

Funded by the
U. S. Department of Health and Human Services

October 2002

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- ❖ FY 2001 CSBG Annual Report
- ❖ Notice of DHCD FY 2001 CSBG Public Hearing
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- ❖ Massachusetts Joint Legislative Committee on Federal
Financial Assistance - FY 2001 CSBG Notice of Plan
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- ❖ Massachusetts CAA List with Designated Areas
- ❖ CSBG In-Depth Monitoring Visit Guide
- ❖ CSBG Community Action Planning Guide

II. LETTER OF TRANSMITTAL

1. Programs Covered by the Plan

The Commonwealth's FY 2003-2004 Community Services Block Grant Consolidated State Plan describes how the Community Services Block Grant (CSBG) program and the Community Food and Nutrition Program (CFNP) operate within Massachusetts. The Plan describes how the state collects and analyzes client information, outcomes, and assists in determining local service delivery, program needs, and priorities.

2. Federal Fiscal Years

The State Plan describes how the CSBG and CFNP program will be operated for federal fiscal years 2003 and 2004.

3. Designation of Lead Agency to Administer the CSBG Program and Contract Information

In accordance with Section 676(a)(1) of the Community Services Block Grant Act, as amended (P.L. 105-285), the Governor of the Commonwealth of Massachusetts has designated the Department of Housing and Community Development (DHCD) as the lead administering agency of the Community Services Block Grant (CSBG), including the Community Food and Nutrition Program (CFNP). Jane Wallis Gumble, as Director of DHCD, is authorized to sign federal assurances and all other documents pertaining to the CSBG.

The State office to receive the CSBG award notices is:

Jane Wallis Gumble
Director
Department of Housing and Community Development
One Congress Street
Boston, MA 02114
Office: (617) 727-7765
Fax: (617) 727-4259
E-mail: Jane.Gumble@state.ma.us

The contact person for the CSBG program issues is:

Sandra L. Hawes
Acting Associate Director
Division of Neighborhood Services
Department of Housing and Community Development
One Congress Street
Boston, MA 02114
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Fax: (617) 727-4259
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Employer Identification Number: 1-046002284-L3

4. Authorizing State Statute

The Massachusetts Economic Opportunity Act of 1984, as amended, M.G.L. c. 23B sec. 24.

Note: The Department was formerly known as the Executive Office of Communities and Development.

The Massachusetts State Legislature passed “The Economic Opportunity Act’ for low income citizens of the Commonwealth of Massachusetts.

Consistent with the Community Services Block Grant Act, [Public Law 97-35, Section 672 et seq. as amended 42 USC. Sec. 9901 et seq.], the Commonwealth of Massachusetts Economic Opportunity Act provides:

- A. A definition of terms used for programs operated by the Commonwealth of Massachusetts, e.g., Community Action Agency, Community Services Block Grant, Density of Poverty . . . ;
- B. A description of the requirements for a community action agency Board of Directors and the qualifications which must be met in order for an organization to be recognized as a community action agency;
- C. A description of the contractual relationship between the state and community action agencies, including the Director of the Department, authority to promulgate regulations governing the use of funds, community action agency performance criteria, and the de-designation procedure;
- D. the process by which a community action agency may be designated to serve an unserved area;
- E. A description of how Community Services Block Grant funds will be distributed with ninety percent (90%) for community action agencies, five percent (5%) for discretionary of Special Projects, and five percent (5%) for the Department grant administration expenses; and
- F. A description of the Director’s authority, subject to appropriation, to disburse additional funds, and for community action agencies to obtain funds other than those distributed by the Director of DHCD.

III. COVER LETTER FROM GOVERNOR



JANE SWIFT
GOVERNOR

THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE DEPARTMENT
STATE HOUSE • BOSTON 02133
(617) 727-3600

July 5, 2002

Clarence Carter, Director
Office of Community Services
Administration for Children and Families
United States Department
of Health and Human Services
370 L'Enfant Promenade, SW
Washington, D.C. 20447

Dear Mr. Carter:

In accordance with §9908(a)(1) of the Community Services Block Grant Act, as most recently amended (42 U.S.C. §9901 et seq.), I hereby designate the Department of Housing and Community Development (DHCD) to act as the lead agency for the administration of the Community Services Block Grant. Jane Wallis Gumble, as the Director of DHCD, is authorized to sign federal assurances and all other documents pertaining to the Community Services Block Grant.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jane M. Swift", written over the printed name.

Jane M. Swift

IV. STATUTORY ASSURANCE

Statement of Federal, CSBG, and CFNP Assurances

As part of the annual or bi-annual application and plan required by Section 676 of the Community Services Block Grant Act as amended, (42 U.S.C. 9901 et seq.) (The Act), the Department of Housing and Community Development acting as the lead agency for the administration of the CSBG hereby agrees to the Assurances in Section 676 of the Act.

A. Programmatic Assurances

- (1) Funds made available through this grant or allotment will be used:
 - (a) To support activities that are designed to assist low income families and individuals, including families and individuals receiving assistance under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), homeless families and individuals, migrant or seasonal farmworkers, and elderly low income individuals and families to enable the families and individuals to:
 - (i) remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
 - (ii) secure and retain meaningful employment;
 - (iii) attain an adequate education, with particular attention toward improving literacy skills of low income families in the communities involved, which may include carrying out family literacy initiatives;
 - (iv) make better use of available income;
 - (v) obtain and maintain adequate housing and a suitable living environment;
 - (vi) obtain emergency assistance through loans, grants, or other means to meet immediate and urgent family and individual needs; and
 - (vii) achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

- (b) To address the needs of youth in low income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and after school child care programs; and
 - (c) To make more effective use of, and to coordinate with, other programs (including State welfare reform efforts). [’676(b)(1)]
- (2) To describe how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in Section 675C(b) of the Act in accordance with the Community Services Block Grant program, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of the Community Services Block Grant program. [’676(b)(2)]
- (3) To provide information provided by eligible entities in the State, including:
 - (a) a description of the service delivery system, for services provided or coordinated with funds made available through grants made under Section 675C(a) of the Act, targeted to low income individuals and families in communities within the State;
 - (b) a description of how linkages will be developed to fill identified gaps in services, through the provision of information, referrals, case management, and follow-up consultations;
 - (c) a description of how funds made available through grants made under Section 675(a) will be coordinated with other public and private resources; and
 - (d) a description of how local entities will use the funds to support innovative community and neighborhood-based initiatives related to the purposes of the Community Services Block Grant, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging effective parenting. [’676(b)(3)]
- (4) To ensure that eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low income individuals. [’676(b)(4)]
- (5) That the State and the eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services to low income individuals and to avoid duplication

of such services, and State and the eligible entities will coordinate the provision of employment and training activities in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998. [’676(b)(5)]

- (6) To ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low-income home energy assistance) are conducted in such communities. [’676(b)(6)]
- (7) To permit and cooperate with Federal investigations undertaken in accordance with Section 678D of the Act. [’676(b)(7)]
- (8) That any eligible entity in the State that received funding in the previous fiscal year through a Community Services Block Grant under the Community Services Block Grant program will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b) of the Act. [’676(b)(8)]
- (9) That the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations. [’676(b)(9)]
- (10) To require each eligible entity in the State to establish procedures under which a low income individual, community organization, or religious organization, or representative of low income individuals that considers its organization, or low income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation. [’676(b)(10)]
- (11) To secure from each eligible entity in the State, as a condition to receipt of funding, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs. [’676(b)(11)]
- (12) That the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to Section 678E(b) of the Act. [’676(b)(12)]
- (13) To provide information describing how the State will carry out these assurances. [’676(b)(13)] (This is the Narrative CSBG State Plan)

B. Administrative Assurances

The State further agrees to the following, as required under the Act:

- (1) To submit an application to the Secretary containing information and provisions that describe the programs for which assistance is sought under the Community Services Block Grant program prepared in accordance with and containing the information described in Section 676 of the Act. [‘675A(b)]
- (2) To use not less than 90 percent of the funds made available to the State by the Secretary under Section 675A or 675B of the Act to make grants to eligible entities for the stated purposes of the Community Services Block Grant program and to make such funds available to eligible entities for obligation during the fiscal year and the succeeding fiscal year, subject to the provisions regarding recapture and redistribution of unobligated funds outlined below. [‘675C(a)(1) and (2)]
- (3) In the event that the State elects to recapture and redistribute funds to an eligible entity through a grant made under Section 675C(a)(1) when unobligated funds exceed 20 percent of the amount so distributed to such eligible entity for such fiscal year, the State agrees to redistribute recaptured funds to an eligible entity, or require the original recipient of the funds to redistribute the funds to private, nonprofit organization, located within the community served by the original recipient of the funds, for activities consistent with the purposes of the Community Services Block Grant program. [‘675C(a)(3)]
- (4) To spend no more than the greater of \$55,000 or 5 percent of its grant received under Section 675A or the State allotment received under Section 675B for administrative expenses, including monitoring activities. [‘675C(b)(2)]
- (5) In states with a charity tax credit in effect under state law, the State agrees to comply with the requirements and limitations specified in Section 675(c) regarding use of funds for statewide activities to provide charity tax credits to qualified charities whose predominant activity is the provision of direct services within the United States to individuals and families whose annual incomes generally do not exceed 185 percent of the poverty line in order to prevent or alleviate poverty among such individuals and families. [‘675(c)]
- (6) That the lead agency will hold at least one hearing in the State with sufficient time and statewide distribution of notice of such hearing, to provide to the public an opportunity to comment on the proposed use and distribution of funds to be provided through the grant or allotment under Section 675A or ‘675B for the period covered by the State plan. [‘676(a)(2)(B)]
- (7) That the chief executive officer of the State will designate, an appropriate State agency for purposes of carrying out State Community Services Block Grant program activities. [‘676(a)(1)]

- (8) To hold at least one legislative hearing every three years in conjunction with the development of the State plan. [’676(a)(3)]
- (9) To make available for the public inspection each plan or revised State plan in such a manner as will facilitate review of and comment on the plan. [’676(e)(2)]
- (10) To conduct the following reviews of eligible entities:
 - (a) full on-site review of each such entity at least once during each three-year period;
 - (b) an on-site review of each newly designated entity immediately after the completion of the first year in which such entity receives funds through the Community Services Block Grant program;
 - (c) follow-up reviews including prompt return visits to eligible entities, and their programs, that fail to meet the goals, standards, and requirements established by the State; and
 - (d) other reviews as appropriate, including reviews of entities with programs that have had other Federal, State or local grants (other than assistance provided under the Community Services Block Grant program) terminated for cause. [’678B(a)]
- (11) In the event that the State determines that an eligible entity fails to comply with the terms of an agreement or the State plan, to provide services under the Community Services Block Grant program or to meet appropriate standards, goals, and other requirements established by the State (including performance objectives), the State will comply with the requirements outlined in Section 678C of the Act, to:
 - (a) inform the entity of the deficiency to be corrected;
 - (b) require the entity to correct the deficiency;
 - (c) offer training and technical assistance as appropriate to help correct the deficiency, and submit to the Secretary a report describing the training and technical assistance offered or stating the reasons for determining that training and technical assistance are not appropriate;
 - (d) at the discretion of the State, offer the eligible entity an opportunity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan and to either approve the proposed plan or specify reasons why the proposed plan cannot be approved; and
 - (e) after providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding to the eligible entity unless the entity corrects the deficiency. [’678(C)(a)]

- (12) To establish fiscal controls, procedures, audits and inspections, as required under Sections 6781D(a)(1) and 678D(a)(2) of the Act.
- (13) To repay to the United States amounts found not to have been expended in accordance with the Act, or the Secretary may offset such amounts against any other amount to which the State is or may become entitled under the Community Services Block Grant program. [’678D(a)(3)]
- (14) To participate, by October 1, 2001, and ensure that all-eligible entities in the State participate in the Results-Oriented Management and Accountability (ROMA) System [’678E(a)(1)].
- (15) To prepare and submit to the Secretary an annual report on the measured performance of the State and its eligible entities, as described under ’678E(a)(2) of the Act.
- (16) To comply with the prohibition against use of Community Services Block Grant funds for the purchase or improvement of land, or the purchase, construction, or permanent improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or other facility, as described in Section 678F(a) of the Act.
- (17) To ensure that programs assisted by Community Services Block Grant funds shall not be carried out in a manner involving the use of program funds, the provision of services, or the employment or assignment of personnel in a manner supporting or resulting in the identification of such programs with any partisan or nonpartisan political activity or any political activity associated with a candidate, or contending faction or group, in an election for public or party office; any activity to provide voters or prospective voters with transportation to the polls or similar assistance with any such election, or any voter registration activity. [’678F(b)]
- (18) To ensure that no person shall, on the basis of race, color, national origin or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with Community Services Block Grant program funds. Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.) or with respect to an otherwise qualified individual with a disability as provided in Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 12131 et seq.) shall also apply to any such program or activity. [’678F(c)]
- (19) Section 679. Operational Rule

“(a) Religious Organizations Included as Nongovernmental Providers.---For any program carried out by the Federal Government, or by a State or local government under this subtitle, the government shall consider, on the same basis as other nongovernmental organizations, religious organizations to provide the assistance under the program, so long as the program is implemented in a manner consistent with the Establishment Clause of the first amendment of the Constitution. Neither the Federal

Government nor a State or local government receiving funds under this subtitle shall discriminate against an organization that provides assistance under, or applies to provide assistance under, this subtitle, on the basis that the organization has a religious character.

(b) Religious Character and Independence

1. In General – A religious organization that provides assistance under a program described in subsection (a) shall retain its religious character and control over the definition, development, practice and expression of its religious beliefs.
2. Additional Safeguards – Neither the Federal Government nor a State or a local government shall require a religious organization –
 - a. to alter its form of internal governance, except (for purposes of administration of the community services block grant program) as provided in section 676B; or
 - b. to remove religious art, icons, scripture, or other symbols; in order to be eligible to provide assistance under a program described in subsection (a).
3. Employment practices – A religious organization's exemption provided under section 702 of the Civil Rights Act of 1964 (42 U.S.C. 200e-1) regarding employment practices shall not be affected by its participation in, or receipt of funds from, program described in subsection (a).

(c) Limitations on Use of Funds for Certain Purposes.---

No funds provided directly to a religious organization to provide assistance under any program described in subsection (a) shall be expended for sectarian worship, instruction, or proselytization.

(d) Fiscal Accountability.---

- (1) In General.—Except as provided in paragraph (2), any religious organization providing assistance under any program described in subsection (a) shall be subject to the same regulations as other nongovernmental organizations to account in accord with generally accepted accounting principles for the use of such funds provided under such program.
- (2) Limited Audit.—Such organization shall segregate government funds provided under such program into a separate account. Only the government funds shall be subject to audit by the government.

(e) Treatment of Eligible Entities and Other Intermediate Organizations.—If an eligible entity or other organization (referred to in this subsection as an ‘intermediate organization’), acting under a contract, or grant or other agreement, with the Federal Government or a State or local government, is given the authority under the contract or agreement to select nongovernmental organizations to provide assistance under the programs described in subsection (a), the intermediate organization shall have the same duties under this section as the government.”

C. Other Administrative Certifications

The State also certifies the following:

- (1) To provide assurances that cost and accounting standards of the Office of Management and Budget (OMB Circular A-110 and A-122) shall apply to a recipient of Community Services Block Grant program funds.
- (2) To comply with the requirements of Public Law 103-227, Part C Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994, which requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18 if the services are funded by a Federal grant, contract, loan or loan guarantee. The State further agrees that it will require the language of this certification be included in any subawards, which contain provisions for children's services and that all subgrantees shall certify accordingly.

D. Statement of CFNP Assurances

As part of the annual or biannual application and plan required by Section 681 of the Community Services Block Grant Act, as amended, (42 U.S.C. 9901 et seq.) (the Act), the designee of the Chief Executive of the State hereby agrees to provide for community based, local and statewide programs to accomplish the objectives of the Community Food and Nutrition Program (CFNP), as follows:

- (1) To coordinate private and public food assistance resources, where coordination is inadequate, in order to better serve low income populations;
- (2) to assist low income communities to identify potential sponsors of child nutrition programs and to initiate such programs in underserved or unserved areas; and
- (3) to develop innovative approaches to meet the nutrition needs of low-income individuals.

Signature

Date

Jane Wallis Gumble, Director, Department of Housing and Community Development

Administrator/Director of Designated Lead Agency

V. HEARINGS AND PUBLIC REVIEWS

1. Public Inspection of Plan [42 USC 9908 (e)]

The Department encourages public participation in the development of services and activities covered by this Plan, including the opportunity to review, and/or submit written comments. The draft plan was available for public inspection between July 18 - August 16, 2002.

In order to facilitate this requirement, the Department:

- a. The Bureau of Neighborhood's (BoN) director met with a designated CAA representative to discuss the FY 2003-2004 goals;
- b. Notification of the proposed FY 2003-2004 CSBG Consolidated State Plan was sent to community action agencies, other appropriate public and private social service organizations, the Massachusetts House and Senate Committees on Ways and Means, the State Department of Personnel Administration, and other interested parties; and
- c. The proposed plan was available on the DHCD website:
<http://www.state.ma.us/dhcd/default.htm>

2. Public Hearing [42 USC 9908 (a) (2) (B)]

The Department provided written notification to CAAs and other appropriate entities announcing the Department's intention to hold a public hearing on the proposed FY 2003-2004 CSBG Consolidated State Plan. Notification of the public hearing's date, time and location was posted on DHCD's website.

A public hearing on the Plan was convened at the DHCD August 16, 2002, One Congress Street, 10th Floor, Boston, MA. Testimony and/or written comments received were considered in the development of the final CSBG Consolidated State Plan.

3. Legislative Hearing [42 USC 9908 (a) (3)]

The last Legislative Hearing before the Massachusetts Joint Legislative Committee on Federal Financial Assistance was held on September 26, 2000, at the State House, Boston, MA. The legislative hearing included an opportunity for public comment and was held separately from the public hearing referenced above.

VI. STATE ADMINISTRATIVE STRUCTURE

The Department is the Commonwealth's principal authority on public housing and community development issues that effect the state's 351 cities and towns. In this role, the Department utilizes state and federal funds and technical assistance available to strengthen communities and help them plan new developments, encourages economic development, revitalizes older areas, improves local government management, builds and manages public housing, stimulates affordable rental and homeownership through the public/private sector and responds to the needs of low-income people. The Department administers the state's public housing programs, coordinates its anti-poverty

efforts, allocates federal community development programs, and provides a variety of services to local government officials.

Mission

The mission of the Department of Housing and Community Development (DHCD) is to strengthen cities, towns, and neighborhoods to enhance the quality of life of Massachusetts's residents. To accomplish our mission, DHCD will provide leadership, professional assistance, and financial resources to promote safe, decent affordable housing opportunities, economic vitality of communities and sound municipal management. We will forge partnerships with regional and local governments, public agencies, community-based organizations, and the business community to achieve our common goals and objectives. In all of these efforts, we will recognize and respect the diverse needs, circumstances, and characteristics of individuals and communities.

The Department of Housing and Community Development is committed to:

1. programs and funding that target populations of low to moderate incomes and those with special needs;
2. coordinated, integrated and balanced agency responses to address the comprehensive needs and interests of communities;
3. programs and technical assistance designed to facilitate informed decision making at the local level, and to encourage self-sufficiency of residents and communities; and
4. sound business practices that ensure the highest standards of public accountability and responsibility.

The Director's Office

The Director is a cabinet-level official who is appointed by the Governor to administer and maintain executive authority over all phases of departmental activities and coordinates policy with the Governor and the rest of the Administration. The Director is a member of the Board of Directors (Vice Chairman) of the MassHousing (formerly the Massachusetts Housing Finance Agency), the Massachusetts Housing Partnership Fund, and the Community Development Finance Corporation. The Director is also a member of the Local Government Advisory Council, and is co-chair of the Commonwealth's Economic Assistance Coordinating Committee. The Director of the Department also serves on numerous other state boards and commission.

The Office of the Director includes the Office of the Chief of Staff and the Communications Office. The Director is also assisted by the Office of the Deputy Director for Policy Development, Office of the Chief Counsel, and Office of Administration and Finance.

The Department is responsible for a variety of programs and services that are administered through four (4) divisions (Division of Neighborhood Services, Division of Municipal Development, Division of Public Housing and Rental Assistance, and the Division of Private Housing) and several commissions, including the Commission of Indian Affairs, the Manufactured Homes Commission, and the American and Canadian/French Cultural Exchange Commission.

In addition, the following quasi-public agencies are affiliates of the Department: the Massachusetts Housing Finance Agency; the Community Development Finance Corporation; the Massachusetts Community Economic Development Assistance Corporation and the Massachusetts Housing Partnership.

Division of Neighborhood Services

This Division is the conduit through which the Department serves Massachusetts' low-income population. The Division is responsible for planning, implementing, and monitoring the delivery of federal and state anti-poverty, neighborhood economic development, homelessness prevention, fuel assistance, and weatherization programs across the Commonwealth, working in cooperation with the federal government, other state agencies, local and regional nonprofits, and the private sector. The Division of Neighborhood Services (DNS) is organized into three (3) components: the Bureau of Neighborhoods (BoN), the Bureau of Energy Programs (BEP), and the Fiscal Affairs Unit.

The Bureau of Neighborhoods (BoN) administers the Community Services Block Grant, the Community Food and Nutrition Program, and the Community Services Block Grant Special Projects program. The Bureau also administers four (4) state-funded programs. They are: 1) the Community Enterprise Economic Development (CEED) program; 2) the Neighborhood Housing Services (NHS) program; 3) the Housing Services Program (HSP); and 4) the Housing Consumer Education Centers (HCEC) program.

The Bureau of Energy Programs (BEP) receives funding from the US Department of Energy to manage the Weatherization Assistance Program and from HHS to manage the Low Income Home Energy Assistance Program through a network of 28 nonprofit organizations, most of which are community action agencies. The bureau also manages the Commonwealth's Low Income Sewer and Water Assistance Program, a program designed to help low-income homeowners pay their water and sewer bills.

The Fiscal Affairs Unit manages all financial, budgeting, and accounting functions of the Division.

Under the current threshold and risk-based criteria established for the state's single audit, the CSBG program is not considered a "major program" or a "high risk program". However, as part of the single audit, independent auditors review departmental internal control procedures. Internal control procedures are designed to cover the controls existing for all bureaus and programs of the department. Thus, the CSBG established controls come under the purview of the independent auditor of the state's single audit.

In addition to the state's single audit, DHCD mandates that sub-recipients of CSBG funds comply with OMB Circular A-133. Each eligible entity receiving CSBG funds submits a single agency-wide audit performed by an independent auditor in conformance with Circular A-133. These audits are given desk review, and where necessary, a Management Decision letter is issued by DHCD. The Fiscal Affairs Unit follows through resolution on any audit findings reported in the single audit.

Furthermore, at least once every year, fiscal staff performs a fiscal on-site monitoring visit to each sub-recipient agency. These on-site visits are in addition to the in-depth fiscal and program

assessment review required under the Coats Human Services Reauthorization Act of 1998, Public Law 105-285.

Division of Municipal Development

Municipal Development concerns itself with the complex problems facing Massachusetts's communities and uses the Department's financial and human resources to help municipal governments holistically by building capacity, stabilizing their condition, and improving their quality of life. The Division is involved with infrastructure development and improvement, municipal government capacity building, land use planning, local economic development, housing rehabilitation, and social services. Municipal Development provides direct consulting, information and training services programs to all local governments. The division also provides a referral service to help communities access the services they need both inside and outside the Department.

Division of Public Housing and Rental Assistance

This Division is responsible for administrative oversight of state-aided public and private housing programs that address the housing needs of low and moderate-income families, the elderly and persons with disabilities. The Division is comprised of: the Bureau of Federal Rental Assistance, which has responsibility for rental subsidies, upgrading of substandard rental housing, and a wide spectrum of support services tied to a rental subsidy; the Bureau of State Rental Assistance, which provides rental subsidies in a flexible way that is more responsive to client choices; the Bureau of Housing Management which oversees the operation and management of 254 local housing authorities and their nearly 50,000 public housing units; the Bureau of Housing Finance which has fiscal oversight of the financial records and capital expenditures of local housing authorities; the Bureau of Housing Development and Construction which has responsibility for the design, development, and construction of new public housing units and the modernization of existing ones; and the Bureau of Housing Inspections which conducts or supervises inspections of residential properties under various state financing, subsidy, or other programs.

Division of Private Housing

The Division of Private Housing provides affordable homeownership and rental opportunities in the private sector. Among the programs that are administered by the division are those that fund and encourage the development of mixed-income projects sponsored by community housing partnerships and developers, that make housing and foreclosure properties available to first time homebuyers, and provide advantageous home financing terms for low and moderate income families.

A. Grant/Contract Management

Each CAA receives a refunding application prior to the beginning of the grantee contract period. The application includes the CSBG national goals and outcome measures, proposed distribution of funds, federal certification, contract documents, workplan requirements; linking activities to the Community Action Planning documents; and will detail all requirements that must be met by grantees as a condition of receipt of funding. Applications will be submitted by September 1, 2002. Staff will review current activities, establish priorities, and identify training and technical assistance needs. Staff will also assist grantees in preparing workplan revisions as needed.

Upon completion of the review and approval process, full execution of contract documents and compliance with all reporting requirements, grantees are eligible to receive funds.

Distribution of Funds

The Department shall award at least 90% of the CSBG funds allocated to the Commonwealth of Massachusetts to eligible entities based on a historical formula. The Department anticipates that the Commonwealth of Massachusetts will receive approximately \$16,125,390 in Community Services Block Grant funding from the US Department of Health and Human Services for FY 2003, of which 90%, or \$14,512,851, will be awarded to eligible entities.

In the event that the federal CSBG appropriation for FY 2003 or FY 2004 is less than the amount received by the Commonwealth for the prior fiscal year, the Department will allocate funding to eligible entities based on the distribution formula for FY 2002, or in any other manner which is consistent with the requirements of the Community Services Block Grant Act.

The annual funding and contracting cycle will correspond directly to the timely availability of funds from the US Department of Health and Human Services.

The Director, at her discretion, will distribute five percent of the FY 2003 CSBG funds to non-profits for the following purpose(s):

1. providing training and availability of technical assistance to entities in need;
2. coordinating state-operated programs and services targeted to low-income children and families with services (provided by eligible entities and other funded organizations) to ensure increased access to services provided by such state or local agencies;
3. supporting statewide coordination and communication among eligible entities;
4. analyzing the distribution of funds under the CSBG Act within the state to determine if such funds have been targeted to the areas of greatest need; and
5. supporting innovative programs and activities conducted by community action agencies or other neighborhood-based organizations to eliminate poverty, promote self-sufficiency, and promote community revitalization.

The criteria used to select activities for funding include: 1) diversity in the distribution of resources throughout the Commonwealth of Massachusetts; 2) services to assist special or unserved populations; 3) activities that closely reflect broader policy objectives of the Department; 4) activities that support the implementation of ROMA; and 4) other initiatives that expeditiously respond to the needs of low income people, as determined by the Department.

Community Action Planning

As a condition for funding in accordance with the CSBG Act, in FY 2002 each CAA was required to develop and implement a three-year Community Action Plan. CAA's received a comprehensive Action Plan Development Guide that contained all the information necessary for the development of each CAA's FY 2003-2005 Community Action Plan. This year, OCS Consultant Annette Backs-Edwards has reviewed the Community Action Plan Development Guide and her comments and suggestions have been incorporated into the document.

Each Community Action Plan included:

- a community needs assessment;
- a description of the service delivery system targeted to low-income families and individuals in the service area;
- a description of how linkages will be developed to fill identified gaps in services through information, referral, case management, and follow-up consultation;
- a description of how funding under the CSBG Act will be coordinated with other public and private resources;
- a description of how a local entity will use the funds to support innovative community and neighborhood-based initiatives related to the purpose of the CSBG which may include fatherhood initiatives and other initiatives with the goal of strengthening family and encouraging effective parenting; and
- a description of outcome measures to be used to monitor success in promoting self-sufficiency, family stability, and community revitalization.

In order to ensure that the plan would meet statutory requirements, the Bureau of Neighborhoods set benchmarks that included specific goals during the planning process. The first component of the Plan, the Action Planning document, described the planning process to be used by CAA. The second component, the needs assessment rationale summary, provided a description of all needs assessment methods and survey instrument(s) that the CAA utilized during the community needs assessment process. The BoN evaluation process included a three-member team review. The BoN provided extensive technical assistance, both on-site and via the telephone, in the development stage of the plan.

The following chart demonstrates the projected fiscal year 2003 CSBG distribution to Massachusetts' CAAs:

<u>Agency</u>	<u>Proportional Share</u>
1. Action for Boston Community Development, Inc.	38.75%
2. Action, Inc. (Gloucester)	1.86%
3. Berkshire Community Action Council, Inc. (Pittsfield)	2.55%

4.	Cambridge Economic Opportunity Committee, Inc.	2.83%
5.	Citizens for Citizens, Inc. (Fall River)	3.55%
6.	Community Action Agency of Somerville, Inc.	2.83%
7.	Community Action Committee of Cape Cod & Islands, Inc.	2.32%
8.	Community Action, Inc. (Haverhill)	1.93%
9.	Community Action Programs Inter-City, Inc. (Chelsea)	2.04%
10.	Community Teamwork, Inc. (Lowell)	3.34%
11.	Franklin Community Action Corporation, Inc. (Greenfield)	1.84%
12.	Greater Lawrence Community Action Council, Inc.	2.25%
13.	Hampshire Community Action Commission, Inc. (Northampton)	2.32%
14.	Lynn Economic Opportunity, Inc.	2.90%
15.	Montachusett Opportunity Council, Inc. (Fitchburg)	2.57%
16.	North Shore Community Action Programs, Inc.	2.21%
17.	People Acting in Community Endeavors, Inc. (New Bedford)	3.14%
18.	Quincy Community Action Programs, Inc.	1.84%
19.	Self-Help, Inc. (Brockton)	2.99%
20.	South Middlesex Opportunity Council, Inc. (Framingham)	2.03%
21.	South Shore Community Action Council, Inc. (Plymouth)	1.84%
22.	Springfield Partners for Community Action, Inc.	3.40%
23.	Tri-City Community Action Program, Inc. (Malden)	2.71%
24.	Valley Opportunity Council, Inc. (Holyoke)	2.28%
25.	Worcester Community Action Council, Inc.	4.13%

FY 2003 and 2004 CSBG funds awarded to community action agencies and other eligible entities are subject to availability and receipt of such funds from the US Department of Health and Human Services.

The Department may expend up to five percent (5%) of the Community Services Block Grant allocation for administrative expenses including monitoring activities of the Division of Neighborhood Services and the Bureau of Neighborhoods.

B. Tripartite Board Representation

Section 676B(2) of Public Law 105-285, the Community Services Block Grant Act, requires that eligible entities receiving Community Services Block Grant funds comply with the stipulation that boards of directors be constituted so that one-third of the members are elected public officials or their representatives, and not fewer than one-third of the members are persons chosen in accordance with the democratic selection procedures adequate to ensure that they are representative of low income individuals and families in the neighborhood and reside in the neighborhood represented. The remaining one-third represents officials or members of business, industry, labor, faith-based organizations, law enforcement, education, or other major community groups.

1. Petitioning for Adequate Representation, [42 USC 9908 (b)(10)]

Section 29.06 (4) of 760 CMR, Community Services Block Grant regulations require that the by-laws of a CAA or other eligible entity include a description of procedures for selecting new board members in case of a vacancy on the board.

The state requires language within the FY 2003 contract that each grantee must establish procedures to allow low-income individuals, community organization, or religious organizations to petition for adequate representation on the grantee's board.

During BoN's in-depth monitoring process, all compliance documents are reviewed to note any inconsistencies with the Community Services Block Grant Act [760 CMR. 29.00] and other applicable federal and state laws.

2. Public CAA Representation Requirements [42 USC 9910(b)]

Massachusetts does not currently have eligible entities that are public organizations.

C. Eligible Entity Designation Process [42 USC 9909]

The Department may designate an eligible entity to serve unserved area(s) in accordance with 676A of the CSBG Act and 760 CMR. 29.04(3).

The existing CAAs in Massachusetts are eligible entities that receive CSBG funding to carry out programs and activities in their designated service areas. If a city or town has not been, or ceases to be served by an existing CAA under the CSBG, the Department may at any time initiate a process for the designation of a CAA or other eligible entity pursuant to provisions of applicable federal and state law, including the CSBG Act and M.G.L. c.23B § 24. 760 CMR 29.04(3)(b) provides the following:

(b) The procedure for existing CAAs or other eligible entities shall be as follows:

1. The Department will notify in writing and request written application from:

- a. any private nonprofit organization that is geographically located in the unserved area, that is capable of providing a broad range of services designed to eliminate poverty and foster self-sufficiency, and that meets the requirements of the CSBG Act; and
- b. any private/nonprofit eligible entity that is geographically located in an area contiguous to or within reasonable proximity of the unserved area and that is already providing related services in the unserved area.

2. Requirement. In order to serve as the area's designated eligible entity, an entity described in 760 CMR 29.04(3)(b) 1.b. shall agree to add additional numbers, to the board of the entity to ensure adequate representation:

- a. in each of the three required categories described in the CSBG Act and 760

CMR 29.06, by individuals who reside in the community comprised by the unserved area; and

- b. in the category relating to low-income individuals, by members that reside in the neighborhood to be served.
3. Special Consideration. The designation shall be granted to an organization of demonstrated effectiveness in meeting the goals and purposes of the CSBG. Priority may be given to eligible entities that are providing related services in the unserved area, consistent with the needs identified by a community-needs assessment.
4. No Qualified Organization In Or Near Area. If no private, nonprofit organization is identified or determined to be qualified under 760 CMR 29.04(3) to serve the unserved area as an eligible entity, an appropriate political subdivision may be designated to serve as an eligible entity for the area. In order to serve as the eligible entity for that area, the political subdivision shall have a board or other mechanism as required in § 678(b) of the CSBG Act and 760 CMR 29.06.

D. Monitoring [42 USC 9914]

Background

The Coats Human Services Reauthorization Act of 1998, Sections 676 and 678B, requires the Department of Housing and Community Development (DHCD) to perform a full onsite review of each Community Action Agency (CAA) at least once during each 3-year period.

As DHCD finished the first three-year round of Community Services Block Grant (CSBG) in-depth monitoring visits, conclusions were drawn about the information collected and lessons learned during the past years. Moreover, through these monitoring visits new, stronger and hopefully better relationships have been built or re-defined between the DHCD, the Massachusetts Community Action Programs Director's Association (MASSCAP), and the Community Action Agencies (CAAs) of Massachusetts.

Looking back at the documents produced and the experiences gained from past monitoring visits, DHCD has re-visited both the procedure followed to conduct CSBG monitoring of CAAs, and the intent and the goals of such monitoring. The lessons learned from these past experiences have given DHCD the necessary tools to assemble a more efficient and effective plan to carryout the federal monitoring mandate for the next cycle of CSBG monitoring visits.

Past Monitoring Process

The purpose of the past monitoring process was mainly to assess the implementation and management of the CSBG program, as well as other supporting anti-poverty programs and initiatives. This process was performed by means of a tool called "Administrative and Program Management Assessment" (APMA), which included an analysis of the CAA Board of Director's oversight, organizational structure, management systems, including program, financial, and administrative functions, and general capacity and efficiency.

The APMA consisted of an instrument specially designed to assess the implementation of CSBG services and activities. To facilitate the APMA process, an assessment team was formed consisting of up to eight members who represented management, program and fiscal interests. During the course of the assessment, the APMA team interviewed CAA's key management staff as well as board members to assess their level of involvement in policy formulation, organizational development, community action planning, and program implementation. The APMA also included an inspection of client information systems, record keeping procedures, and data collection practices and capabilities. The team reviewed pertinent administrative, fiscal and program file documents and records.

The New Monitoring System

The purposes of the new monitoring process

Thanks to the old monitoring process, DHCD has now comprehensive information regarding the organizational structure of CAAs that allows it to direct its efforts to the monitoring of the programmatic aspect of these agencies.

DHCD started to work on the new monitoring system at the beginning of fiscal year 2001. Numerous meetings were held between DHCD monitoring staff to analyze the old APMA tool and to draft the plans for the new system. In September 2001, DHCD presented the new monitoring system's initial framework to MASSCAP for review and comments. In the following months DHCD developed the theoretical and practical details of the monitoring system, and in February 2002, it was presented at a MASSCAP meeting in Worcester, to CAAs' Executive Directors. During this opportunity CAAs provided various comments on the new system. Resulting from this meeting DHCD revised a couple of aspects on new monitoring system, and March 2002 met with MASSCAP to convey additional explanation on the new system and to clarify potential doubts.

The new monitoring process has a two-fold purpose. On the one hand, to build an efficient and effective monitoring system, linking all instances of communication that occurs during the three years between the federally mandated on-site CSBG monitoring visits, avoiding duplication of requests for information and utilizing more proficiently the information received. Accordingly, the information gathered through these instances: documentation submitted to DHCD (e.g. Community Action Plan, workplans, grant applications, etc.), technical assistance provided (e.g. State wide trainings, specific agency assistance, etc.), pre-assessment documents, and on-site visits, will be systemically inter-related to constitute the CSBG monitoring system.

On the other hand, the new system instead of centering around the question of whether a CAA is organizationally capable of implementing antipoverty programs, it will focus on verifying whether a CAA is meeting the three goals of the CSBG act: 1. *the reduction of poverty*; 2. *the revitalization of low-income communities* and; 3. *the empowerment of low-income families and individuals in rural and urban areas to become fully self-sufficient*. The new monitoring system although will still review numerous organizational aspects (as it is federally requested of the State-), will analyze the information collected during a three-year period to assess whether CAAs' services and programs are being delivered in accordance with the five strategies described in the CSBG act (*the strengthening community capabilities for planning; the organization of services in accordance to the needs of the low-income population; the greater use of innovative and effective community-based approaches to attack the causes of poverty; the maximum*

participation of residents of the low-income communities to empower them to resolve their needs; the broadening of the resource base of antipoverty programs) and thus, are meeting the goals of the act. DHCD believes that this new approach to monitoring will allow identifying both organizational and programmatic issues with enough time in advance to take appropriate corrective action before the final monitoring report is produced.

The idea of the new monitoring process is to determine not only if the CAA is in fact providing the services outlined -and authorized by- the CSBG act, but also how are those services being delivered. At this point it is important to bring forth that DHCD will use the Results Oriented Management and Accountability system (ROMA) as a key instrument to determine whether community action agencies are delivering services in a sound manner. In this sense, CAAs must have in place all the instruments necessary to fully incorporate ROMA into their everyday state of affairs and thus, be able to provide evidence of the effectiveness of their programs' service delivery. The leading aim for the new monitoring system is to use ROMA's client and family goals, community goals, and agency goals, to precise the level of influence of CAAs' service delivery in the low-income population of Massachusetts.

The practical implications of the new system

Having established the purposes of the new monitoring process, we will now elucidate its practical implications.

As mentioned above, the Federal mandate requires that the Department of Housing and Community Development (DHCD) perform a full onsite review of each community action agency at least once during each 3-year period.

In the past, to follow the federal mandate DHCD performed extensive on-site visits to monitor in-depth CAAs. The idea of the new system is to accomplish the federal mandate by monitoring an agency throughout the three-year period between on-site visits, focusing more on analyzing the information gathered through different instances instead of performing one-time intensive monitoring visits. By linking and analyzing the information collected during the three year period, the new system will ensure that the State is fully accomplishing section 678B of federal mandate that is, that the State be capable of determining "*whether eligible entities meet the performance goals, administrative standards, financial management requirements, and other requirements of the State (...)*". With the new monitoring system DHCD will no longer have "snapshot" approval of a CAA's capacity, but an ongoing engagement with the agency working together toward the same goals (i.e. the three goals of the CSBG Act).

The instances of information gathered are the following:

1. Stage One - Community Action Plan: If the main purpose of the new monitoring system is to switch from focusing (without excluding their review) on the organizational aspects of CAAs to concentrate on their ability to meet the goals of the CSBG act, then the Community Action Plan (CAP) because of its planning nature, will play an fundamental role in the new system. In order to determine whether a CAA is meeting the three goals of the CSBG act, DHCD will observe the links between the goals that CAAs establish on their CAPs to what is stated later in different documents (grant applications, workplans, IS survey, etc.) submitted to this state agency.

Through this system, the Community Action Plan expands its vital value by becoming the initiating force that drives the entire monitoring process.

2. Stage Two - In House Assessment: In the past process, all the information required to perform the on-site monitoring visit was gathered on a pre-assessment document primarily completed a few weeks prior to the visit. With the new system, DHCD will assemble and analyze CSBG-related information in-house throughout the years between the CAP and the on-site monitoring visit. That is, DHCD will assess workplans, board minutes, progress and financial reports, responses to request for information, and any other relevant information indicative of the organizational and programmatic health of an agency. For example, instead of trying to determine whether a CAA is following parliamentary procedures to elect board members (-as required by State and Federal regulations-), solely by means of a questioning a CAA's board president during the on-site monitoring visit, DHCD will also analyze the information contained in by-laws and board minutes to verify this point.
3. Stage Three - On-Site Visits: As a result of the new system, the on-site monitoring visit will no longer have a gathering information function but will be the instance where information collected and analyzed previously will be verified and/or clarified. For the on-site visit, contact will be made with CAAs and all applicable Division of Neighborhood staff members, at least two months in advance to schedule dates for the monitoring assessment. Approximately 2 –3 days are set aside for conducting interviews. The CAA will be notified that key management staff, fiscal staff, program staff, and board of director's members will be interviewed. The program representative sends a letter to the CAA confirming the dates of the assessment. In addition, various compliance documents can be requested from the CAA (e.g., bylaws, articles of incorporation, personnel policies, etc.). All documentation from the CAA is due one month prior to the date of visit. An agenda of interviews and interview times for the assessment is developed and sent to CAA approximately one month in advance. Monitoring also includes a review of CAA administrative files as well as review of applicable programmatic case files. An in-depth monitoring assessment at a CAA includes the following interviews:
 - Board President
 - Board Treasurer
 - Executive Director
 - Deputy Director (if applicable)
 - Fiscal Director and appropriate staff
 - Key program directors, including MIS director
 - Delegate agency directors (if applicable).
 - Other local stakeholders and interested parties (if applicable).

This in-depth monitoring system will utilize a team approach on the state level. BoN program and management staff as well as staff from the Division of Neighborhood Services' Fiscal Affairs Unit, and from the Bureau of Energy Programs when applicable, will perform in-house pre-assessments and on-site monitoring visits in concordance with the CSBG monitoring system.

During the years that an on-site monitoring visit does not occur at a CAA, the assigned BoN program representative, is required to attend at least one board of director's meeting. Prior to a board meeting, the program representative requests and reviews the agenda. After attending a board

meeting, a Board Meeting Monitoring Report is completed no later than five days after a program representative has attended a meeting. The field monitoring coordinator, prior to it being mailed to the CAA, reviews and approves it.

In addition, Division of Neighborhood Services staff, when needed or requested by a CAA, provides technical assistance. For example, the Bureau of Neighborhoods provides training to CAA staff on Information Systems, and the Fiscal Affairs Unit provides fiscal training to CAA Boards.

4. Corrective Action Plans

Preparing for the new system

The new monitoring system will strengthen the possibility for corrective action by increasing the moments in which it will be possible to identify problems in a CAAs' programmatic and/or organizational areas. If CAAs are monitored by linking and analyzing the information collected in stages during a three year period (instead of every three-year snapshot approvals of a CAAs' capacity-), then new system will ensure an ongoing engagement with the agency, identifying problems as soon as they occur and thus enhancing the possibility to take immediate corrective action, and to provide opportune technical assistance when appropriate. However, if it is determined that an agency fails to deliver services as provided in the CSBG Act, state will follow procedures as directed under Section 678 C of the Act.

Fiscal Monitoring

As the structure of the new monitoring system is finalized, the Fiscal Affairs Units (FAU) of the Division of Neighborhood Services (DNS) has continued with the fiscal monitoring of CAAs. FAU conducted an Annual fiscal review of the CSBG, LIHEAP, WAP and HEARTWAP programs run by CAAs. The objective of the review was to ensure that all programs were operated in compliance with applicable State and Federal laws, regulations, contracts and budgets and to offer training and technical assistance where necessary. In addition, the FAU requires each CAA to submit an annual agency audit that is reviewed for significant findings.

ROMA and Community Action Plan Monitoring and Technical Assistance

Additionally, in order to prepare CAAs concerning the programmatic emphasis of the new monitoring system, the Bureau of Neighborhoods' (BoN) Program Representatives accompanied the Rensselaerville Institute (TRI) during the Outcome Management on-site training visits conducted in the spring 2002 (see page 33 for details), to provide technical assistance and monitor the development of the 2003-2005 Community Action Plan (CAP) process. BoN staff provided and developed a comprehensive form to analyze CAAs' steps in formulating and evaluating CAP (Community Action Plans final submission are due to DHCD on August 2002-). The forms included a review of how Community Action Plans developed geographic targeting, determination of beneficiaries, planning, goal setting to be used as basis for program design and evaluation, design of the service delivery system, resident involvement, and program assessment.

Board ROMA Training

At the Federal Department of Health and Human Services (DHHS) Office of Community Services (OCS) sponsored Results-Oriented Management and Accountability (ROMA) implementation-planning session in Chicago held in July 2001, representatives from the Massachusetts Department of Housing and Community Development (DHCD) and the Massachusetts Community Action

Program Directors' Association (MASSCAP) learned that only 28 percent of the Boards of Directors of the 25 CAAs operating in Massachusetts have participated in ROMA training. This weakness in the overall approach to ROMA implementation compelled DHCD and MASSCAP to enhance the ROMA implementation plan by including ROMA training for all Massachusetts CAA Boards of Directors. In September 2001, DHCD and MASSCAP applied for and were awarded a grant from the Department of Health and Human Services to develop ROMA training for CAAs boards in Massachusetts.

DHCD contracted the Rensselaerville Institute (TRI) to conduct fifteen on-site trainings and two train-the-trainers sessions to conclude with Board ROMA training to all twenty-five Community Action Agencies. To the date eight on site Board ROMA trainings have been conducted, seven more are scheduled for September 2002 and the train-the-trainers sessions are also scheduled for September.

The Board ROMA training outlines the usefulness of Outcome Management for development and implementation of the roles and responsibilities of the board. This training will also be reinforced by an interactive section of the MASSCAP website for Board members functioning as a moderated ROMA forum. The training will have several beneficial impacts: the dialogue between executive directors, senior staff, and members of Boards of Directors will be improved; the quality of community needs assessments will be improved; enhanced understanding by the Board and staff of the agency's priorities will occur; the quality of the community action plan will be improved; ROMA implementation will be facilitated; program development and implementation will be improved; etc.

<p align="center">DIVISION OF NEIGHBORHOODS</p> <p align="center">IN-DEPTH MONITORING ASSESSMENT SCHEDULE</p>

	<u>YEAR 1 - FY 2003</u>		<u>YEAR 2 - FY 2004</u>		<u>YEAR 3 - FY 2005</u>
1	GLCAC January 2003	7	LEO August 2003	16	CAPIC July 2004
2	CEOC February 2003	8	NSCAP September 2003	17	BCAC November 2004
3	CAAS March 2003	9	SHI October 2003	18	CFC January 2005
4	PACE April 2003	10	CAI November 2003	19	SPCA February 2005
5	TRICAP May 2003	11	SMOC February 2003	20	FCAC March 2005
6	ABCD June 2003	12	WCAC March 2004	21	SSCAC April 2004
		13	QCAP April 2004	22	CTI May 2004
		14	Action May 2004	23	VOC June 2004
		15	HCAC June 2004	24	MOC July 2004
				25	CACCCI August 2004

E. Termination or Reduction of Funding [42 USC 9908(b)(8); 42 USC 9915]

The Department has delineated its termination procedures in Section 29.05 Correction Action: Termination and Reduction of Funding of 760 CMR 29.00: Massachusetts General Laws c.23B – The Department of Housing and Community Development – Community Services Block Grant Regulations.

Section 29.05 Corrective Action: Termination and Reduction of Funding

- (1) If the Director of the Department determines, on the basis of a final decision in a review pursuant to § 678B of the CSBG Act and 760 CMR 29.09 that an eligible entity fails to comply with the terms of a Department funding agreement, or the Consolidated CSBG State Plan, to provide services under the CSBG Act or to meet appropriate standards, goals, and other requirements established by the State (including performance objectives), the Department shall:

- a. inform the entity of the deficiency to be corrected;
 - b. require the entity to correct the deficiency;
 - c. offer training and technical assistance, if appropriate, to help correct the deficiency, and prepare and submit to the Secretary a report describing the training and technical assistance offered; or if the Department determines that such training and technical assistance are not appropriate, prepare and submit to the Secretary a report stating the reasons for the determination;
 - d. at the discretion of the Department (taking into account the seriousness of the deficiency and the time required to correct the deficiency), allow the entity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan to correct such deficiency within a reasonable period of time, as determined by the Director of the Department; and not later than 30 days after receiving from an eligible entity a proposed quality improvement plan, either approve such proposed plan or specify the reasons why the proposed plan cannot be approved; and
 - e. after providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding of the eligible entity unless the entity corrects the deficiency.
- (2) A determination to terminate the designation or reduce the funding of an eligible entity is reviewed by the Director in accordance with the CSBG Act.
- (3) The procedures set forth in 760 CMR 29.05 are intended to be carried out consistent with the protections and procedures provided in the CSBG Act; as it may be amended, and any applicable federal regulations. In the case of a conflict, the federal requirements shall prevail.
- (4) A community action agency (CAA) or other eligible entity will not have its present or future funding terminated and the Department will not de-designate a CAA or other eligible entity until Section 678C of the CSBG Act procedures are followed and reviewed by the Secretary of the US Department of Health and Human Services is completed pursuant to Section 678C(B) of the CSBG Act. Nor will it have its funding reduced below the proportional share of funding it received the previous fiscal year, except in accordance with the requirements of the CSBG Act.

As part of the monitoring process, the CAA is provided a draft report for review and comment. CAAs are provided information on how it is meeting the CSBG assurances. The CAA is given a period of time to provide a written response to the monitoring report. Training will be provided in combination with the onsite compliance monitoring. Monitoring of subgrantee agencies will emphasize the identification of training needs as well as compliance with federal and state regulations. Training will be provided both on-site during monitoring and in follow-up sessions. If further action is needed, the Department will form a Steering Committee comprised of two Department representatives, two

MASSCAP representatives and two grantee representatives. The Steering Committee will convene regular meetings concerning the oversight and status of recommendation tasks.

The Department believes this approach eliminates any interruption of services to communities, and avoids increasing any negative public perceptions.

VII. COMMUNITY SERVICES NETWORK DESCRIPTION [42 USC 9908(b)(3)(A)]

Eligible Entity Characteristics

There are twenty-five (25) community based nonprofit organizations designated by the US Department of Health and Human Services and the Director of DHCD to serve as the community action agencies (CAAs) in the Commonwealth of Massachusetts.

The historical and enabling source of funding for these CAAs is the CSBG Act. Since 1981, Congress and the US Department of Health and Human Services have annually appropriated CSBG funds to the state, which the state in turn distributes to CAAs. With these funds, CAAs develop and coordinate locally generated programs and activities that address the causes of poverty in their respective geographic service area(s). The table on page 32 shows the total number of clients served and the total CSBG and non-CSBG budget of each eligible entity in Massachusetts utilizing the most recent data from the CSBG/IS Survey.

Further information concerning the geographic coverage and name, address, and coverage area for each eligible entity is included in the attached Massachusetts CAA List.

The CSBG program will consist of activities having a measurable and potentially major impact on the causes of poverty in those areas of the community where poverty is a particularly acute problem. Activities designated to assist low income individuals include:

1. securing and retaining meaningful employment;
2. education and literacy program, including computer learning centers;
3. community economic development
4. budgeting counseling;
5. maintaining adequate housing and a suitable living environment;
6. emergency assistance through loans or grants to meet immediate and urgent individual and family needs, including the need for health services, hunger prevention, housing search, and employment-related assistance;
7. removing obstacles and solving problems which block achievement of self-sufficiency;
8. energy Assistance;
9. greater participation in the affairs of the community;
10. counteracting conditions of starvation and malnutrition;
11. transitioning from welfare to work
12. youth and family development, including after-school child care, youth mediation, fatherhood; and,
13. linkages and coordination with other local entities.

The Bureau of Neighborhoods is responsible for the following major functions:

- ◆ developing the CSBG Annual Consolidated State Plan;
- ◆ preparing federal funding applications and assurances, community action agency funding applications, and formulating funding recommendations;
- ◆ overseeing of the annual contracting process;
- ◆ providing technical assistance and training to community action agency managers and board of directors;
- ◆ monitoring compliance and performance of grantees;
- ◆ enforcing applicable state and federal laws, rules, regulations, statutes, and administrative/policy directives;
- ◆ evaluating CAA strategic corrective action plans; and
- ◆ compiling statistical and qualitative reports.

Prior to the start of each fiscal year, Bureau of Neighborhoods program representatives and community action agency (CAA) executive directors confer, negotiate, and agree on eligible, measurable workplan objectives, staffing, and allowable program expenses. In addition, DNS Staff visit assigned community action agencies at least once every three (3) years to conduct performance and compliance monitoring reviews, program evaluations, provide technical assistance, and/or attend board meetings as deemed appropriate by the Bureau's Director. Monitoring is carried out in accordance with the Bureau of Neighborhoods CSBG Monitoring Visit Guide.

The Department will support a wide range of services and activities as prescribed in the 2003 - 2004 CSBG Consolidated State Plan within Section IX Planned Use of CSBG Funds. All areas of the state will be provided service programs through direct contracts with eligible entities.

ELIGIBLE ENTITIES CHARACTERISTICS:

CAA	Location	Client Served ¹	Fiscal Year	Non-CSBG Budget	TOTAL BUDGET
			2001 CSBG Budget		
Action for Boston Community Development, Inc.	BOSTON	74,097	\$ 5,184,479	\$103,057,603	\$108,242,082
Action, Inc.	GLOUCESTER	5,253	\$ 248,855	\$ 11,871,000	\$ 12,119,855
Berkshire Community Action Council, Inc.	PITTSFIELD	6,002	\$ 341,172	\$ 5,599,590	\$ 5,940,762
Community Action Agency of Somerville, Inc.	SOMERVILLE	957	\$ 318,427	\$ 2,787,770	\$ 3,106,197
Community Action Committee of Cape Cod & Islands, Inc.	HYANNIS	2,059	\$ 310,400	\$ 6,697,704	\$ 7,008,104
Community Action, Inc.	HAVERHILL	9,029	\$ 258,220	\$ 8,434,074	\$ 8,692,294
Community Action Programs, Inter-City, Inc.	CHELSEA	4,982	\$ 272,938	\$ 7,499,845	\$ 7,772,783
Cambridge Economic Opportunity Council, Inc.	CAMBRIDGE	18,637	\$ 378,634	\$ 1,888,566	\$ 2,267,200
Citizens for Citizens, Inc.	FALL RIVER	28,151	\$ 474,965	\$ 20,477,682	\$ 20,952,647
Community Teamwork, Inc.	LOWELL	19,134	\$ 446,869	\$ 38,943,798	\$ 39,390,667
Franklin Community Action Corporation	GREENFIELD	12,668	\$ 246,179	\$ 11,578,474	\$ 11,824,653
Greater Lawrence Community Action Council, Inc.	LAWRENCE	16,930	\$ 301,034	\$ 21,026,245	\$ 21,327,279
Hampshire Community Action Commission	NORTHAMPTON	2,486	\$ 310,400	\$ 9,470,775	\$ 9,781,175
Lynn Economic Opportunity, Inc.	LYNN	10,332	\$ 388,000	\$ 7,261,467	\$ 7,649,467
Montachusett Opportunity Council, Inc.	FITCHBURG	25,773	\$ 343,848	\$ 14,377,453	\$ 14,721,301
North Shore Community Action Council, Inc.	PEABODY	9,538	\$ 295,683	\$ 4,247,670	\$ 4,543,353
People Acting in Community Endeavors, Inc.	NEW BEDFORD	23,701	\$ 420,110	\$ 39,540,610	\$ 39,960,720
Quincy Community Action Programs, Inc.	QUINCY	9,700	\$ 246,179	\$ 20,141,406	\$ 20,387,585
Self-Help, Inc.	AVON	10,881	\$ 400,041	\$ 21,263,922	\$ 21,663,963
South Middlesex Opportunity Council, Inc.	FRAMINGHAM	25,400	\$ 271,600	\$ 43,280,002	\$ 43,551,602
Springfield Partners for Community Action, Inc.	SPRINGFIELD	4,105	\$ 454,896	\$ 1,687,571	\$ 2,142,467
South Shore Community Action Council, Inc.	PLYMOUTH	20,298	\$ 246,179	\$ 11,581,245	\$ 11,827,424
Tri-City Community Action Program, Inc.	MALDEN	9,989	\$ 362,579	\$ 6,371,962	\$ 6,734,541
Valley Opportunity Council, Inc.	HOLYOKE	11,919	\$ 305,048	\$ 16,227,684	\$ 16,532,732
Worcester Community Action Council, Inc.	WORCESTER	23,204	\$ 552,565	\$ 13,169,902	\$ 13,722,467
TOTAL		382,225	\$13,379,300	\$448,484,020	\$461,863,320

¹ Unduplicated number of individual clients reported in fiscal year 2001 CSBG IS Survey

¹ Unduplicated number of individual clients reported in fiscal year 2001 CSBG IS Survey.

VIII. RESULTS ORIENTED MANAGEMENT AND ACCOUNTABILITY SYSTEM (ROMA) IMPLEMENTATION [42 USC 9908 (b)(12), 42 USC 9917]

In 1994, the BoN began implementing ROMA by utilizing Massachusetts' discretionary funds to provide CAAs with the opportunity to develop computerized client demographic information. This competitive grant process continued annually, through fiscal year 1997, until all 25 CAAs had developed the capacity to comply with the annual CSBG Information System survey. The early focus on building appropriate and flexible computerized client tracking systems that specifically addressed the individual needs of each CAA, placed Massachusetts' CAAs in an excellent position to further implement ROMA. All CAAs track and report program outcomes, and many are well on their way to updating their automated client tracking and reporting systems to include program outcomes.

By the beginning of fiscal year 1998 all 25 Massachusetts CAAs had the capacity to report the results of services utilizing the standard ROMA National Goals and Outcome Measures (NG/OMs). BoN assured this outcome by requiring each CAA to include an Evaluation/Outcome Measures section in its submitted Community Action Plan, and to project goals and outcomes for the fiscal years 1997 – 1999. The evaluation section described the NG/OMs selected by each CAA (Goals #1, #3 & #6 were required at minimum), and a plan for measuring outcomes. Each CAA was required to include its selected NG/OMs in its fiscal year 1997 CSBG workplan and to report NG/OMs results in its final CSBG progress report.

During fiscal year 2002, the Director of DHCD authorized the use of CSBG discretionary funds for the creation of a DHCD-CAA E-Government network initiative. The project, which is slated to be completed by the end of calendar year 2002, is designed to achieve at least three major performance targets: (1) all 25 Community Action Agencies will be able electronically transfer CSBG fiscal, client demographic, and outcome data to DHCD; (2) staff members at all 25 CAAs will be able to compile, analyze, and transfer CSBG data to DHCD with limited supervision and technical assistance; and (3) DHCD will have access, without compromising strict client confidentiality standards, to a statewide CSBG database from which further analyses and snapshot reports may be generated for policy and decision making purposes. At present, DHCD is working with a software company to develop a customized web-based application that will facilitate this new data collection and data analysis environment for CSBG program in Massachusetts.

During FY 00, BoN also revised the CSBG Monitoring and Assessment Tool to include, an evaluation of each CAA's MIS and data collection capacity, and an assessment of its senior management and program staffs' understanding of the NG/OMs. The results of this monitoring process were used to determine what additional technical assistance is needed regarding data collection and/or ROMA implementation. The monitoring and assessment tool is currently being revised.

During fiscal year 1998 BoN program representatives continued to provide technical assistance to CAAs to facilitate the reporting of NG/OMs in the final CSBG program progress report and the FY 1998 CSBG/IS Survey. In addition, the BoN held a second ROMA workshop at the MASSCAP Annual Conference in August 1999.

BoN continued its efforts to train CAAs in implementing ROMA in FY 1999 through a series of ROMA trainings conducted in conjunction with the state of Connecticut. Julie Jakopic, of the

National Association for State Community Services Programs conducted two trainings, one in Massachusetts and one in Connecticut. The training focused on ROMA basics, outcome reporting, selecting appropriate outcome measures, and utilizing scales and ladders.

During fiscal year 2001, representatives from DHCD and the Massachusetts Community Action Program Directors' Association (MASSCAP) met with representatives from the Office of Community Services (OCS), Administration for Children and Families to discuss the status of ROMA implementation in Massachusetts. Although it was recognized that Massachusetts is implementing ROMA successfully, a general concern for OCS was that only 28 percent of the Board of Directors of the 25 Community Action Agencies have participated in formal ROMA training. The need for further ROMA training was agreed upon and became part of Massachusetts' ROMA implementation plan. In response to this finding, DHCD applied for and received a \$35,300 Training, Technical Assistance and Capacity Building Program grant from the OCS. Awarded jointly to DHCD and MASSCAP, this grant is for a board training project focusing on the Board of Director's function and capacity building for all 25 Community Action Agency boards. The training will be reinforced by an interactive forum on the MASSCAP website that will provide on-going ROMA support and training to the Boards. DHCD has retained the services of Rensselaerville Institute, a New York based training and technical assistance institute.

DHCD staff met with CAA and MASSCAP representatives, formed an Outcome Management Implementation Project Work Team, and developed a ROMA Vision Statement for Massachusetts to:

- Further integrate outcome measurement in all aspects of CSBG planning and reporting;
- use outcome data to influence state policy and implementation;
- demonstrate actual impacts achieved through investments made by DHCD;
- become organizations that lead change and demonstrate community and client impacts;
- build communities that have the resources citizens want and need; and
- support citizens to achieve safe housing, nutritious food, good education, and stable families.

Consultants from the Rensselaerville Institute assisted DHCD and CAA representatives develop this Vision Statement.

FY 2002 also marked the beginning of the FY 2003-2005 Community Action Planning process, which was designed to specifically address the requirements of the Coats Reauthorization Act of 1998. As described above, the planning process involved, the implementation of a comprehensive community needs assessment, the development of a service delivery system based on the needs assessment results, and the selection of appropriate National Goals and Outcome Measures for each program described in the CAAs service delivery system. One-on-one technical assistance regarding ROMA was made available to all CAAs and on-site visits were conducted as needed.

Prior to the on-site ROMA technical assistance visit, each agency prepared performance target outlines for selected programs and presented the outlines to DHCD. The outlines were reviewed by consultants from the Rensselaerville Institute and DHCD staff and were discussed during the on-site technical assistance visits.

DHCD is revising the existing CSBG annual application and reporting process so that it is more in line with DHCD's outcome framework and training/technical assistance provided by Rensselaerville Institute and each CAA's Community Action Plan.

Relevant ROMA Goals and Outcomes

CAAs in Massachusetts have adopted and have been reporting on the following NG/OMs. (Please note that in some instances lettering and description of measures have been changed to correspond with the National Goals and Outcome Measures published in October 1999). Furthermore, the BoN, during fiscal year 1999 and 2001, developed additional outcome measures to standardize the use of "other" outcome measures listed under each National Goal. During fiscal years 2001-2002, the BoN continued and further expanded the process of standardizing the use of NG/OMs among Massachusetts CAAs. The Bureau will develop and recommend the use of specific outcome measures for all major CAA programs in Massachusetts during Fy 03 - 05. The following shows the existing Bureau of Neighborhoods Outcome Measures.

National Goals and Outcome Measures

GOAL 1: Low-Income People Become More Self-Sufficient

- A. Number of participants seeking employment that obtain it, as compared with the total number of participants.
- B. Number of participants maintaining employment for a full 12 months.
- C. Number of households in which adults members obtain and maintained employment for at least 90 days.
- D. Number of households with an annual increase in the number of hours of employment.
- E. Number of household experiencing an increase in annual income as a result of earnings.
- F. Number of participating families moving from substandard housing into stable standard housing, as compared with the total number of participating families.
- G. Other outcome measures specific to the work of the CAA.
- H. Number of clients who consider themselves more self-sufficient since participating in services or activities of the agency.
- I. Number of people progressing toward literacy and/or GED.
- J. Number of people making progress toward post-secondary degree or vocational training.
- K. Number of clients reporting an increase an income since participating in the services of the agency.

GOAL 2: The Conditions in Which Low-Income People Live Are Improved

- A. Number of accessible, living wage jobs created and/or retained.
- B. Increase in the availability and affordability of essential services, e.g. transportation, medical care, child care.
- C. Number of households who believe the CAA has improved the conditions in which they live.

GOAL: 3 Low-Income People Own a Stake in their Community

- A. Number of households owning or actively participating in the management of their housing.

- B. Amount of "community investment" brought to the community by the Network and targeted to low-income people.
- C. Number of households participating or volunteering in one or more groups.
- D. Number of households who say they feel they are part of the community.

GOAL 4: Partnerships among Supporters and Providers of Services to Low-Income People are Achieved

- A. Number of partnerships established and/or maintained with other public and private entities to mobilize and leverage resources to provide services to low-income people.
- B. Numbers of principal partners who are satisfied with partnership.

GOAL 5: Agencies Increase their Capacity to Achieve Results

- A. Total Dollars mobilized by the agency.
- B. Number of boards making changes as a result of periodic organizational assessment.
- C. Number of programs, which have become more effective as a result of research data.
- D. Number of agencies increasing their number of funding sources and increasing the total value of resources available for services to low-income people.

GOAL 6: Low-Income people, Especially Vulnerable Populations, Achieve their Potential by Strengthening Family and Other Supportive Systems

- A. Number of aged households maintaining an independent living situation.
- B. Number of disabled or medically challenged persons maintaining an independent living situation.
- C. Number of households in crisis whose emergency needs are ameliorated.
- D. Number of participating families moving from homelessness or transitional housing into stable standard housing.
- E. Number of household in which there has been an increase in children's involvement in extracurricular activities.

Bureau of Neighborhoods Outcome Measures

Child Care; Day Care

#1j: Number of parents able to train for, seek, obtain and/or maintain employment as a result of services.

Head Start

#6h: Number of children who experience healthy growth and development and whose families are strengthened through participation in Head Start

Fuel Assistance

#2h: Number of low-income households who have increased their disposable income through receipt of Fuel Assistance

Fuel Assistance (Emergency)

#6e: Number of households in crisis whose

Weatherization:

emergency needs are ameliorated

#2h: Number of households who reduce their annual energy costs through energy conservation measures

Food and Nutrition Programs (e.g., Food pantries; Food Distribution Programs; Food Stamps; Farmers Market Coupons; Summer Feeding, CFNP; Nutrition Education, etc.)

#2h: Number of households who have increased access to nutritious food and/or nutrition information and education

Note: #6e: Number of households in crisis whose emergency needs are ameliorated *can also be used for emergency Food Pantry and emergency food distribution programs.*

WIC

#2h: Number of at risk mothers who improve their pre-natal health and/or health of new born and young children through participation in the WIC program

Information & Referral (Non-Emergency):

#6h: Number of requests for assistance that result in increased access to resources

Homelessness Assistance Program (HAP)

#1j: Number of participating families who are near homeless or at-risk of homelessness who maintain their tenancy as a result of program intervention.

#1j: Number of families placed in safe, permanent housing who maintain this status for at least six (6) months.

1st Time Homebuyers

#1j: Number of participants better able to negotiate a first time home purchase through successful completion of a 1st time homebuyers program

Volunteer Programs (e.g., RSVP; Foster Grandparents; AmeriCorps, etc.)

#3f: Number of individuals who actively participate in their community through volunteer services

Fiscal Year 2002 Process and Future Direction

Scales and Ladders

As a response to the national movement to utilize Scales and Ladders as a primary data collection tool during fiscal year 1999, the BoN began instituting a process for systematic implementation of Scales and Ladders at the CAA level. BoN formed an ad-hoc committee of Bureau staff and CAA representatives to develop and implement a Scales and Ladders tool for use throughout the CAA network. Volunteer CAAs were asked to provide input in the development of a family scale and utilize the tool in conjunction with a case management program.

The committee made some assumptions about the five steps, as it developed the 14 scales. Those were:

- **In-Crisis:** The situation needs immediate attention (e.g., for every scale there is an actual crisis that must be addressed without delay).
- **At-Risk:** If the situation is not addressed promptly, it will likely deteriorate and become a crisis.
- **Safe:** There is no anticipation of the situation deteriorating into an at-risk situation, at the very least, in the short-term.
- **Stable:** The situation is stable and may not deteriorate any further. Intervention is not a priority.
- **Thriving:** The situation is stable and the client meets all criteria for self-sufficiency including all indicators within the scale.

The committee also discussed other or remaining assumptions during the process:

1. The scales should be objective, qualitative, and flexible.
2. The system of scales should be developed to allow each agency, as well as the individual case manager to use as many or as few scales as desired.
3. The scales should allow agencies to interpret/reflect local conditions. Agencies and individual caseworkers should be allowed to reinterpret definitions to fit immediate client needs and conditions.
4. The scales were designed to maximize the likelihood of movements by clients along the scale from step to step.

Based on these assumptions, the committee developed the following draft Scales using five ladders:

- Employment
- Child Education
- Adult Education
- Youth and Family Development
- Child Care
- Family Development
- Housing
- Income Management
- Transportation
- Resident Participation
- Nutrition

During fiscal years 2001-2002 BoN implemented the following goals:

- Goal 1:** The CSBG Ad-hoc Committee completed the development of the Family Development Scales and Ladders Tool and implementation guidelines.
- Goal 2:** In cooperation with CAAs, the BoN had begun implementation (on a pilot basis) of the Massachusetts Family Development Scales and Ladders Tool. The first phase of the pilot program ended in February 2002 and the second phase of the program is currently underway.
- Goal 3:** BoN measured the impact of the Scales and Ladders Tool through data gathered from the 1st pilot phase and is in the process of developing a schedule for implementation at all 25 CAAs.

With this second round of Scales and Ladders Pilot grants, currently 12 out of 25 CAAs in Massachusetts have the capacity to run family self-sufficiency projects using the Massachusetts Family Self-Sufficiency Scales and Ladders tool.

Family Credentialing Program

The BoN, in cooperation with the Montachusett Opportunity Council, Inc. (MOC – Fitchburg) has developed a *Family Development Training and Credentialing Program*. The program is for frontline workers at CAAs to gain the skills and competencies necessary to further assist families to achieve greater economic and social self-sufficiency. *The Family Development Training and Credentialing Program* is being proposed as a multi-year project: staff training for the first year, and the introduction and utilization of a family scale (e.g., thriving, stable, safe, at-risk, and in-crisis) to measure the progress of families participating in the program, during the second year. The Bureau implemented the following goals during FY 01 - 02:

Goal 1: The Bureau contracted with the Montachusett Opportunity Council, Inc. (MOC – Fitchburg) to initiate the *Family Development Training and Credentialing Program*. During FY 02, the contract had been extended to one additional year.

Goal 2: During FY 03-04, The Bureau will measure the success of staff training on the *family credentialing* based on curriculum developed by Cornell University in New York.

Training

During fiscal year 2002, the BoN developed a training process on the topic of ROMA for CAA board members and staff, as well as for BoN staff. This training offered participants the opportunity to further strengthen their skills in the development of performance-based contracts and management systems. In an environment where linking performance to payments and budgets is occurring, this training will prove to be beneficial. During FY 02, the Bureau completed the following goals:

Goal 1: Completed a needs assessment survey of CAA board members and staff which identified training needs on the topic of ROMA.

Goal 2: Complete a statewide training on ROMA for all 25 CAAs on site. Technical assistance was provided to 24 out of 25 CAAs.

Information Technology

Even though Massachusetts did not mandate electronic transfer of data between CAAs and BoN, fiscal year 2000 marked the beginning of electronic submission of data on a limited basis. For the first time, CAAs were able to report electronically (via e-mail) to BoN their fiscal year 1999 CSBG information System Survey as copies of survey forms in compatible format were made available to CAAs prior to their submission on computer disk and/or via e-mail. For the last few years, BoN has been utilizing software provided by the National Association for State Community Services Programs (NASCSPP) to compile data from CAAs and submit its annual CSBG Information System Survey to NASCSPP. During FY 2001, the BoN electronically submitted the CSBG/IS survey to NASCSPP. This electronic submission will allow NASCSPP to compile Massachusetts state totals into a larger national database, as well as to review, if necessary, individual CAAs' CSBG data.

The BoN is a member of the Massachusetts Community Action Agency Program Association's (MASSCAP) Information Technology Committee. The Committee's most recent accomplishments include: development of a pilot program across the state to provide CAA clients with computer access and training so that they can acquire the comfort level and skills necessary to succeed in the new information age economy; an Information Technology Mentor Program for CAA staff; and facilitation of a Digital Age conference in April 2002, in cooperation with the Asset Development Institute, Center on Hunger and Poverty at Brandeis University. At present, the Committee is working with a consultant to develop on-line discussion Forums for Community Action Agencies in Massachusetts. During the fiscal year 2003-2004, BoN will continue the process with the following goals in mind:

Goal 1: To institute a process whereby all 25 CAAs in Massachusetts will electronically report their CSBG information system data to DHCD.

Goal 2: To provide CAAs with compatible electronic versions of essential state reporting forms and encourage them to submit their reports online to BoN.

IX. PLANNED USE OF CSBG FUNDS

A. Eligible Entities

1. As described previously, the Department shall award at least 90% of the CSBG funds allocated to the Commonwealth of Massachusetts to the 25 private, non-profit eligible entities. The Department anticipates that the Commonwealth of Massachusetts will receive approximately \$16,125,390 in Community Services Block Grant funding from the US Department of Health and Health Services for FY 2003, of which 90%, (\$14,512,851) will be awarded to eligible entities based on a historical funding formula.

In the event that the federal CSBG appropriation for FY 2003 and FY 2004 is less than the amount received by the Commonwealth for FY 2002, the Department will allocate funding to eligible entities based on the distribution formula used for FY 2002, or in any other manner which is consistent with the requirements of the Community Services Block Grant Act.

Community Services Block Grant funds that are distributed as grants to eligible entities and have not been expended by an entity may be carried over into the next fiscal year for expenditure by the entity for program purposes.

The annual funding and contracting cycle will correspond directly to the timely availability of funds from the US Department of Health and Human Services.

If less than 100% of the grant or allotment received is distributed to eligible entities as described above, the Director, at her discretion, shall ensure that not more than 5% of the CSBG funds is budgeted for the following purposes:

1. providing training and technical assistance to entities in need of such training and assistance;
2. coordinating state-operated programs and services targeted to low income children and families with services (provided by eligible entities and other funded organization) to ensure increased access to services provided by such state or local agencies;
3. supporting statewide coordination and communication among eligible entities;
4. analyzing the distribution of funds under the CSBG Act within the state to determine if such funds have been targeted to the areas of greatest need; and

5. supporting innovative programs and activities conducted by community action agencies or other neighborhood based organizations to eliminate poverty, promote self-sufficiency, and promote community revitalization.

The criteria used to select activities for funding include: 1) diversity in the distribution of resources throughout the Commonwealth of Massachusetts; 2) services to assist special or unserved populations; 3) activities that closely reflect broader policy objectives of the Department; and 4) other initiatives that expeditiously respond to the needs of low income people, as determined by the Department.

2. The following list shows on a statewide basis all CSBG funded programs within applicable program categories. Even though the information was gathered from fiscal year 1999 CSBG/IS Survey, it indicates three program areas where CAAs can further expand their services.

The Bureau of Neighborhoods, during the fiscal year 2003-2004, will encourage CAAs to increase the total number of programs implemented under Self-Sufficiency, Economic Development, Income Maintenance, Senior Youth and Resident Participation categories. This strategy will help CAAs address poverty, using a holistic approach.

Programs Supported by CSBG Funds: Fiscal Year 2001 - 2002

SERVICE CATEGORIES	Approximate number of Programs	% of Total	Program Type
SELF-SUFFICIENCY	25	3.99	Family Self-sufficiency case management/individual self-sufficiency programs.
EMPLOYMENT	51	7.99	Adult Work Experience; Head Start Staff OJT; Information and Referral; job/career counseling; skills training programs; staff training and development for CAA employees; summer youth jobs programs; and youth work experience program.
ECONOMIC DEVELOPMENT	6	0.95	Community economic development projects.
EDUCATION/LITERACY	111	17.45	Adult Basic Education/GED; educational counseling and guidance; ESL instructions; and Information and Referral; Head Start; child care; day care.
INCOME MANAGEMENT	25	3.88	Budget/credit/financial counseling; consumer education and protection; Income Tax counseling; and Information and Referral.
HOUSING ASSISTANCE	77	12.15	1 st time homebuyers/homeownership counseling; affordable housing preservation, housing search and placement and landlord/tenant advocacy.
NUTRITION	78	12.37	Community Food and Nutrition Program; food banks and food pantries; nutrition education and counseling; SHARE program; Summer Feeding programs; surplus food/commodities distribution; WIC; and holiday food program.
HEALTH	23	3.66	Alcohol and drug abuse prevention; family planning services; primary health care; transportation to medical appointments; substance abuse treatment.

EMERGENCY ASSISTANCE	47	7.43	Crisis intervention and counseling; donated goods; homelessness prevention; emergency cash assistance; FEMA; emergency transportation.
ENERGY ASSISTANCE	38	6.02	Fuel Assistance; Weatherization Assistance Program; HEARTWAP; Low Income Sewer and Water Assistance Program; private utility assistance.
YOUTH	21	3.24	Summer youth games; youth recreation projects; summer youth employment; school drop out prevention; and homework assistance.
SENIOR	9	1.43	Projects specifically to address the needs of elderly people, such as meals, transportation, telephone assurance, foster grandparents support, inter-generational programs.
RESIDENT PARTICIPATION	5	0.72	Community organizing; community advocacy; community needs assessments; and general outreach.
LINKAGES AND COORDINATION	107	16.94	Toy Giveaway; transportation; community-wide board participation; coalition and partnership building, and Intra and Inter agency planning.
OTHER	12	1.96	Organizational development and capacity building, board and staff training, planning and information technology.
TOTAL	635	100.00	

Source: Fiscal Year 2001 CSBG Information System Survey and Fiscal Year 2002 CSBG contract workplan

B. State Use of Retained/Discretionary Funds [42 USC 9908(B)(2)]

Fiscal Year 2001 – 2002 CSBG Special Projects

During fiscal years 2001 through 2002, the Bureau of Neighborhoods will identify several priority categories in which CSBG Special Projects funding is to be directed. Identification of priority categories will occur in coordination with the state's community action agency director's association, the Massachusetts Community Action Programs Directors' Association (MASSCAP).

In addition, the Bureau will distribute discretionary fund awards on a rolling basis for projects that addresses specific priority areas. Categories take into consideration the Governor's priorities of Affordable Housing, Homelessness Prevention, Education, Senior Health Care, and Welfare Reform.

Priority categories identified to date are:

- Affordable Housing
- Children/Youth Development
- Homelessness Prevention
- Hunger Prevention
- Education
- Welfare Reform
- Other (Professional Development, Research Analysis)

The Director, at her discretion, may also provide financial and technical assistance grants to support a variety of anti-poverty and economic development activities that promote family self-sufficiency. As a matter of course, discretionary funds have been awarded to community action agencies, as well as other community based nonprofit agencies, for start-up projects rather than multi-year funding.

Community Services Block Grant Special Projects awards for FY 22003 and 2004 will be announced as the Department approves them.

The Department of Housing and Community Development (DHCD) is mandated to spend not more than five percent (5%) of the total CSBG allocation on projects and programs at the local levels at the discretion of the Director of DHCD. During fiscal year 2002, DHCD's CSBG discretionary allocation from the U.S. Department of Health and Human Services was \$806,269, of which a total of \$772,549.49 in grants, primarily to community action agencies were allocated. The following is a list of grants and their intended purposes:

- ❖ Action, Inc. (Gloucester) received a \$10,000 grant to implement an English for Speakers of Other Languages Program for Gloucester's growing minority population.
- ❖ Community Action, Inc. (Haverhill) received a \$17,000 grant to conduct a model strategic planning process using the Massachusetts Family Self-Sufficiency Scales and

Ladders matrix. Once developed the CAA will share and train staff members from other CAAs.

- ❖ Community Teamwork, Inc. (Lowell) received a \$50,000 grant to launch a non-profit housing development corporation. The corporation will work with and coordinate the existing housing development network in the Lowell, Lawrence, Haverhill, Gloucester, and Salem areas to develop a wide range of housing projects.
- ❖ Greater Holyoke CDC (Holyoke) received a \$10,000 grant as part of DHCD's Environmental Justice and Neighborhood Planning Initiative. DHCD developed this initiative in FY'01 as a pilot program that was aimed at offering grants for consultant services to organizations in identifying strategies to address specific conditions that threaten the environment of a neighborhood.
- ❖ The Massachusetts Department of Transitional Assistance received \$90,000 in CSBG discretionary funds for their Homeless and Prevention Crisis Program. Funds will be distributed to Low Income Heating and Energy Assistance Program (LIHEAP) providers to help move homeless shelter clients into permanent housing.
- ❖ Massachusetts Community Action Program Directors' Association (MASSCAP) received three grants during fiscal year 2002. Grants were provided to MASSCAP for the following purposes: a \$33,000 grant to continue to work with a group of four (4) statewide associations of human service and job training providers to provide training sessions and networking sessions; a \$30,000 grant to develop six (6) to ten (10) management roundtables for CAA Executive Directors; a \$6,000 grant to enhance MASSCAP's working relationship with the sixteen (16) Regional Employment Boards through a statewide conference.
- ❖ Montachusett Opportunity Council, Inc. (Fitchburg) received two grants during fiscal year 2002: a \$9,350 grant to further implement the Family Development Credential Program for Community Action Agencies and a \$9,000 grant to continue the Youth Tutoring Program at Green Acres Village in Gardner, Massachusetts.
- ❖ North County Community Development Corporation (North Adams) received a \$40,000 grant for to improve the CDC's organizational capacity, especially revenue streams.
- ❖ Rensselaerville Institute, a training and technical assistance organization from New York received a \$20,000 grant to assist the Division of Neighborhood Services with its on-going strategic planning process.
- ❖ Springfield Partners for Community Action, Inc. (Springfield) received a \$75,000 grant to promote Character Education in conjunction with the Massachusetts Basketball Hall of Fame, the Union News, and WGGB TV-40 in Springfield.
- ❖ DHCD provided a total of \$100,000 in Scholarship Program funds to renew the following seven grantees' fiscal year 2001 grants. Each CAA received a \$10,000 Scholarships grant during fiscal year 2002:

Action for Boston Community Development, Inc. (Boston, MA);
Action, Inc. (Gloucester, MA);
Community Action Agency of Somerville, Inc. (Somerville, MA);
Franklin Community Action Corporation (Greenfield, MA);
Quincy Community Action Programs, Inc. (Quincy, MA);
Southern Middlesex Opportunity Council, Inc. (Framingham, MA); and
Tri-City Community Action Programs, Inc. (Malden, MA).

The remaining \$30,000 in Scholarship Program funds will be distributed among three additional CAAs selected through an application process.

This pilot scholarship program was developed by DHCD in fiscal year 2000 to provide CAA clients with funds (maximum of \$1,000 per client) so that they could pursue formal higher education. This includes general education, e.g., literacy skills, short term training in occupational skills, or general post-secondary education.

During fiscal year 2002, DHCD supplemented the fiscal year 2002 Community Enterprise Economic Development (CEED) program by using \$229,120 in CSBG discretionary funds. This measure was necessary to minimize the impact of sudden budget cuts on affordable housing programs operated by many Massachusetts Community Development Corporations.

The total remaining CSBG discretionary fund balance for fiscal year 2002 is \$68,439.92, which includes \$33,719.51 in carry over and recaptured funds from fiscal year 2001. This remaining fund balance has been reserved for continuation of DHCD's ROMA training and technical assistance and other projects.

Fiscal Year 2001

Using fiscal year 2001 allocation and fiscal year 2000 carry-over CSBG discretionary funds, DHCD allocated a total of \$867,607 in grants, primarily to community action agencies. This is approximately \$103,462 more than the previous fiscal year. Grants were provided for the following purposes:

CSBG SCALES AND LADDERS PILOT PROJECT – PHASE II

In cooperation with the CSBG Scales and Ladders Committee, DHCD has developed the Massachusetts Family Self-Sufficiency Scales and Ladders Assessment Matrix encompassing 11 scales and five ladders. During fiscal year 2000, six (6) CAAs were awarded grants to operate a pilot program utilizing the 11 scales. During fiscal year 2001, DHCD continued its support by awarding additional \$120,000 to eight CAAs through a state-wide competitive grant process – three of these CAAs also received a similar grant in fiscal year 2000. This brought the total of number of CAAs in Massachusetts that are implementing Scales and Ladders Pilot project to 11.

SKILLS DEVELOPMENT AND IT ACCESS CENTERS – MASSCAP

The Massachusetts Community Action Program Director's Association (MASSCAP) in collaboration with several CAAs has developed pilot programs across the state that provide CAA

clients with computer access and training so that they can acquire the comfort level and skills necessary to succeed in the new information age economy. Each pilot program is addressing its own unique local need. In addition to training clients, CAA staff (when necessary) are also trained in computer usage in order for all staff to meet a basic level of computer proficiency. A total of \$100,000 was awarded to MASSCAP in fiscal year 2000 and was granted a contract extension in fiscal year 2001 using \$75,000 in CSBG discretionary funds.

MASSCAP continued the development of the IT access centers in fiscal year 2001 by expanding the project to an additional three CAAs i.e., Greater Lawrence Community Action Council, Inc. (Lawrence, MA), Hampshire Community Action Commission (Northampton, MA), and the North Shore Community Action Program (Peabody, MA). The increase resulted in expanded statewide geographical coverage and increased customer service opportunities. The Greater Lawrence Community Action Council established a "Computer Clubroom" with the goal of bringing computer access/literacy to teens in order for them to advance their academic and vocational skills. The Hampshire Community Action Council developed a rural IT access project based in two small existing multi-service sites in rural Hampshire County. The goal of this project would be to increase job skills and access to job opportunities. The North Shore Community Action Council enhanced its existing Transition to Work program. Working with seven family shelters serving families on the North Shore, NSCAP used a system of "floating" sites (Action, Inc. and the Peabody public library) to bring training on computers and the Internet to over 200 people. DHCD's funding also helped MASSCAP underwrite the cost of a Digital Divide conference held in April 2002, in cooperation with the Brandeis University.

MASSACHUSETTS CAA-DHCD E-GOVERNMENT INITIATIVE

The Director of DHCD authorized the use of \$100,000 in CSBG discretionary funds for the creation of a DHCD-CAA E-Government network initiative in fiscal year 2002, which is slated to be completed by the end of 2002. At present, DHCD is working with a software company to develop a customized web-based application that will facilitate this new data collection and data analysis environment for CSBG program in Massachusetts.

MATTAPAN FAMILY SERVICE CENTER – SMALL BUSINESS DEVELOPMENT

The Mattapan Family Service Center received a \$25,000 CSBG discretionary grant in fiscal year 2000. During fiscal year 2001, the agency received an additional \$50,000 to continue its development of the Mattapan Business Assistance Center that provides a place for existing area business owners so that they can maintain and expand their businesses. The new grant supported the expansion and continued development of the center. The center conducts monthly workshops, as well as daily in-depth or tailored assistance to clients, in: business plan development, licensing, product marketing, advertising, signage, zoning, accounting, taxes, workforce development, business technology and the internet, legal issues, customer relations, bid preparation and project estimating, records keeping, business management, loan packaging, insurance and risk management, networking, and conflict resolution.

Working Capital Network/Peer to Peer Partnerships (Worcester, MA)

To support the development and start-up of a Peer-to-Peer small business development program that aims at assisting low-income entrepreneurs in the Worcester area, DHCD awarded a \$25,000 CSBG discretionary grant to the Working Capital Network in fiscal year 2001. The program assists those individuals who fall under 80% of the area's median family income, according to the U.S. Department of Housing and Urban Development (HUD) standards, are self-employed or would-be self-employed, who are not able to access credit from mainstream financial resources. In other words, the organization helps people who are "un-bankable". The Working Capital Network has similar programs operating in the Greater Boston area, Lawrence, Springfield, Gloucester, Brockton, New Bedford, and Palmer areas. The goal of the program was to recruit between 75 and 100 members to the organization and to administer 25-35 loans ranging from \$500 through \$25,000. The organization offered a business education and training program, which included topics such as, how to write a business plan, how to produce a cash flow statement, and how to develop a marketing strategy.

FAMILY ENRICHMENT PROGRAM

Springfield Partners for Community Action, Inc. (Springfield, MA)

The Springfield Partners for Community Action, Inc.'s (SPCA) Family Enrichment/Education Program operates in conjunction with the Massachusetts Society for the Prevention of Cruelty to Children and the Preschool Enrichment Team. Both of these affiliated agencies provide parenting programs and teacher education on the issues of family literacy and family stabilization. The program offers a monthly family literacy newsletter; take home reading materials for children to share with their family members; and family style meals on a bi-monthly basis to SPCA's day care program participants. The meals are followed by a short program featuring family literacy activities, parenting workshops (on family issues, life skills and/or health and nutrition issues), and family support groups. SPCA received a \$20,000 grant in fiscal year 2000 and an additional \$20,000 to continue this initiative throughout fiscal year 2001.

NEIGHBORHOOD PLANNING/ENVIRONMENTAL JUSTICE PILOT PROGRAM

CAAs and other community-based organizations on a day-to-day basis confront a variety of environmental and development issues that adversely affect the neighborhoods in which families live. In order to address this, DHCD developed a program aimed at offering pilot grants for consultant assistance to organizations in identifying strategies to address specific conditions that threaten the environment of a neighborhood. The two purposes of this initiative were: (1) to provide resources to organizations for studies that others (e.g., municipal governments) are unable to provide and (2) to serve as a way of increasing the visibility, currency and viability of organizations as a source of planning for neighborhoods (which may in turn increase the attractiveness of serving in these organizations and strengthen some boards/organizations. Through a statewide competitive grant application process, DHCD awarded grants to the following Community Development Corporations (CDC) to carry out this one-year pilot initiative:

- ❖ Lawrence Community Works (Lawrence, MA) - \$25,000
- ❖ Main South CDC (Worcester, MA) - \$25,000
- ❖ Weir Corporation (Taunton, MA) - \$25,000

COMMUNITY FOOD AND NUTRITION PROGRAM (CFNP)

During fiscal year 2001, DHCD was awarded \$63,212 from the U.S. Department of Health and Human Services to administer the Community Food and Nutrition Program (CFNP) in Massachusetts. Due to this limited amount of resource for CFNP purposes, the Director of DHCD approved the use of a total of \$25,000 in Community Services Block Grant (CSBG) discretionary funds to supplement the program. The combined allocation brought the Community Food and Nutritional Program to a total of \$88,212. Eight CAA were selected as CFNP grantees through a statewide competitive application process that was designed only for CAAs. The fiscal year 2001 CFNP was designed to encourage community action agencies (CAAs) to link CFNP to an established program that lacked a nutrition education component. In addition, applicants were asked to demonstrate how the existing program, with the inclusion of CFNP, would be marketed to residents in the designated service area.

- ❖ The following CAAs received a CFNP grant in fiscal year 2001:
- ❖ Action for Boston Community Development, Inc. (Boston) - \$ 12,202
- ❖ Action, Inc. (Gloucester) - \$8,000
- ❖ Community Action, Inc. - \$12,202
- ❖ Community Action Programs, Inter-City, Inc. (Chelsea) - \$12,000
- ❖ Franklin County Community Action Corporation (Greenfield) - \$12,202
- ❖ Self-Help, Inc. (Avon) - \$12,202
- ❖ Springfield Partners for Community Action, Inc. (Springfield) - \$12,202

ADMINISTRATIVE FUNDS

The Department may expend up to five percent (5%) of the Community Services Block Grant allocation for administrative expenses and grant management monitoring activities of the Division of Neighborhood Services and the Bureau of Neighborhoods.

About seventy percent (70%) of the administrative funds will be earmarked for staff salaries and associated fringe benefits. The remaining thirty percent (30%) will be used for other direct administrative expenditures such as office supplies, travel, conferences, and state overhead costs.

X. COORDINATION AND LEVERAGING OF OTHER FUNDING AT STATE LEVEL [42 USC 9908 (b)(5), 42 USC 9908 (b)(6), 42 USC 9908 (b)(9)]

1. The BoN ensures coordination, linkage and partnership between the CSBG program and other entities by active participation on numerous boards, including, but not limited to the Interagency Task Force for Housing and Homelessness, the State Mental Health Planning Council, and Commonwealth Coordinating Committee to Support Families, Schools and Community Collaboration. DHCD has a sound relationship with MASSCAP, the State Association representing CSBG grantees. Meetings are often coordinated between MASSCAP and various DHCD representatives so that information may be shared concerning a variety of issues concerning low-income individuals.
2. The Department of Labor and Workforce Development (DLWD) was designated by

former Governor Cellucci as the agency responsible for implementing the Workforce Investment Act (WIA). To assure collaboration by the many partnering agencies included in the Act, in the fall of 1998 DLWD convened a group of state workforce development agencies to begin discussions focused on implementing WIA in Massachusetts. Although DHCD did not actively participate in the development of the Massachusetts Unified State Plan, DHCD reviewed the draft plan and met on a number of occasions with representatives of DLWD. DHCD also met with MASSCAP to discuss their ongoing role in participating on a number of the nine sub-committees created to address a range of issues effecting the implementation of WIA. Also, former Governor Cellucci appointed a MassCAP representative to the State Workforce Investment Board. Massachusetts is integrating and coordinating its workforce development system. In Massachusetts - and nationally - the limited engagement between Community Action Agencies and state and regional workforce development systems represents a major lost opportunity in the creation of an effective self-sufficiency continuum. While many Community Action Agencies across the country provide leading-edge programs in worker education and training, in too many localities the CAA network is not systematically or fully integrated with the institutions and services established through the Federal Workforce Investment Act. In some respects, the relationship between these entities mirrors the larger obstacles and opportunities nationally. DHCD is requesting the support of DHHS in the amount of \$34,125 to underwrite the development of training and technical assistance information to strengthen the Self-Sufficiency Continuum. To successfully develop this training and technical assistance information, DHCD has partnered with the Massachusetts Community Action Program Directors' Association (MASSCAP) and the Commonwealth Corporation (CommCorp). In addition, DHCD has solicited and received the endorsement for this project from numerous community, workforce, and economic development agencies. DHCD and its partners have designed the proposed project so that (1) it will reinforce the strategic role CAA agencies and other community-based organizations within the workforce development system play, (2) define the role the entrepreneurial training and minority small business could play in strengthening the continuum, and (3) strengthen agencies' self-sufficiency measuring and reporting systems. DHCD will continue to work with DLWD to ensure greater participation and coordination of CSBG programs.

3. To ensure compliance with the CSBG Assurances and other related administrative and programmatic guidelines, DHCD established a Community Acting Planning System, which requires each CAA to develop a Community Action Plan. Each CAP includes a community needs assessment and a description of how linkages will be developed, coordinated and maintained to fill identified gaps in services. A description of how CSBG funding will be coordinated with other public/private resources to maximize the efficiency of programs and activities and a description of how the CAA will use the funds to support innovative community and neighborhood business initiatives.
4. DHCD will make every effort to identify other available state funding sources for the community services network.
5. DHCD supports innovative community and neighborhood-based initiatives as described earlier within this plan. In addition, in 1998, the Governor established the Governor's Commission on Responsible Fatherhood and Family Support of which DHCD is a member. Community and faith-based agencies responsible for the neighborhood initiatives shared

philosophies, experiences, and lessons learned. One thing that emerged from the Commission meetings was that government must continue to be an effective partner with community organizations to help families help themselves in their communities.

One of the Commission's first undertakings was to lay out guiding principles that included a description of responsible fatherhood:

Responsible, loving fathers make valuable contributions to the well being of children and society. A responsible father uses the child's best interests as a guiding principle for his actions and decisions; sustaining a strong and vital marriage, and if not married, establishes legal paternity, respects the mother of his child, actively shares with the child's mother in the continuing emotional, physical and financial care of their child, from pregnancy onward, and sets a proud example for the child by living within the law and not engaging in violence or other high-risk behavior, including the abuse of alcohol or drugs.

With the guiding principles set out, the Commission undertook an exploration of responsible fatherhood and the needs of families and children.

The Commission produced a report that focuses on family support that has the best interest of children not the rights of parents, but the responsibilities of parents to work together for the good of their children.

The Commission's report identified seven core concepts:

1. Provide access to education and jobs with ways that will support a family.
2. Recognize and promote the importance of caring, committed collaborations and long lasting marriages for children and for society, taking into account religious, ethnic and cultural diversity.
3. Encourage responsible child bearing and reduce the out-of-wedlock birth rate.
4. Ensure financial support for children.
5. Help both parents be better parents.
6. Provide community support for responsible interaction and cooperation between both parents, and their children when the parent's relationship breaks down.
7. Make the Commonwealth more father and family friendly.

In addition, the Commission recommended several next steps:

A public education and outreach campaign to promote responsible fatherhood.

Develop statewide government initiatives.

Adapting government programs to improve resources and training of family law judges

Encouraging faith-based communities to convene a statewide “summit” on families and responsible fatherhood.

Have businesses develop family-friendly business practices, including alternative work schedules, telecommuting and information on balancing work and family responsibilities.

Support better data collection by public and private agencies and the court on marriage, divorce, remarriage, and cohabitation, particularly with respect to families with children.

And finally, issue an annual report on the “State of Fathers and Families in the Commonwealth” which offers a statistical portrait of fathers in Massachusetts and highlights successful efforts to promote responsible fatherhood.

XI. COMMUNITY FOOD AND NUTRITION APPLICATION

1. Proposed CFNP Activities – Fiscal Year 2002

During fiscal year 2002, the Department of Housing and Community Development (DHCD) received \$68,991 in CFNP grant from the U.S. Department of Health and Human Services, Administration for Children and Families, Office of Community Services.

Pursuant to Section 681 of the Coats Human Services Reauthorization Act of 1998, Public Law 105-285, also known as the Community Services Block Grant Act, funds awarded for fiscal year 2002 CFNP purposes shall be used to:

- a) coordinate private and public food assistance resources, whenever such coordination is determined to be inadequate, to better serve low-income individuals;
- b) assist low-income communities to identify potential sponsors of child nutrition programs and to initiate new programs in underserved or unserved areas; and,
- c) develop innovative approaches at the state and local levels to meet the nutrition needs of low-income individuals.

DHCD specifically shall seek responses from community action agencies (CAAs) that will achieve the following criteria:

- ? A demonstration of a measurable impact (s) (e.g., decreased hunger, increased access to resources) on those served under the program.
- ? Agencies that have identified a recent occurrence in their designated service area that has had a negative impact on the local hunger network (e.g. -the loss/reduction of an anti-hunger grant, closing of a food pantry, dramatic increase in emergency food requests).

- ? Agencies that are prepared to provide services for underserved populations (e.g., refugee populations, publication of multi-lingual guides, cultural appropriate foods, multi-lingual workshops).
- ? Agencies willing to work closely with their local Department of Transitional Assistance (DTA) office to increase food stamp outreach.

Fiscal Year 2002 CFNP awards will be announced in September 2002. The contract period will be October 1, 2002 to September 30, 2003.

Fiscal Year 2001

The United States Department of Health and Human Services, Administration for Children and Families, Office of Community Services, allocated \$63,212 to the Commonwealth of Massachusetts for the Community Food and Nutrition (CFNP) purpose for fiscal year 2001. In addition, Jane Gumble, Director, Department of Housing and Community Development (DHCD) allocated \$25,000 in CSBG Special Projects funds. The combined allocation amounted to \$88,212. DHCD awarded the combined CFNP funds to selected community action agencies (CAAs) through a competitive grant application process.

DHCD sought responses from community action agencies (CAAs) and CFNP awards were granted to CAAs that linked CFNP activities to an established program that lacked a nutrition education component. In addition, the selected CAAs demonstrated how the existing program, with the inclusion of the CFNP would be marketed to residents of its designated service area. Proposed outreach included but was not limited to, residents of public housing, and clients of other local community based organizations.

DHCD specifically sought responses from community action agencies (CAAs) that achieved the following criteria:

- ? A demonstration of a measurable impact (s) (e.g., decreased hunger, increased access to resources) on those served under the program.
- ? Community action agencies (CAAs) that had identified a recent occurrence in their designated service area that has had a negative impact on the local hunger network (e.g., the loss/reduction of an anti-hunger grant, closing of a food pantry, dramatic increase in emergency food requests).
- ? Community action agencies (CAAs) that were prepared to provide services for underserved populations (e.g., refugee populations, the publication of multi-lingual guides, cultural appropriate foods, multi-lingual workshops).
- ? A demonstration of measurable impact(s) (e.g., increased hunger, increased access to resources) on those served under the program.
- ? Community action agencies (CAAs) that identified hunger/nutrition as an issue in their designated service area in their (2000-2002) Community Action Plans.

- ? Community action agencies (CAAs) that have not received CFNP funds from during the past three (3) funding cycles.

The following list provides a brief description of the proposed use of CFNP grants in fiscal year 2001:

- ? Action for Boston Community Development, Inc. (Boston) received a \$12,202 grant to translate nutrition education materials so that those materials are more accessible to non-English speaking or bilingual area residents. The project also involved completion of nutritional related training and providing resources to 22 social service/mental health supervisory staff and 6 neighborhood case managers.
- ? Action, Inc. (Gloucester) received an \$8,000 grant to assist 15 area youths obtain five credits towards their high school graduation through completion of a for-credit nutritional course.
- ? Community Action, Inc. (Haverhill) received \$12,202, to assist a total of 1,000 individuals increase their access to nutritious food and/or nutritional education, increase the purchase and consumption of healthy foods by low income residents, increase the level of participation in the agency's Women, Infant, and Children (WIC) nutritional program by 10%, and to increase the overall public knowledge of the nutritional program.
- ? Community Action Programs Inter-City Inc.'s (Chelsea) \$12,000 grant was designed to integrate the CFNP into its existing scales and ladders program. The goal for this program was to assist 25 participants demonstrate movement up one or more steps on a scales and to help 5 out of 35 participants complete career training program as a result of case management services.
- ? Franklin County Community Action Corporation (Greenfield) received \$12,202 in CFNP grant in fiscal year 2001. The program was designed to assist 295 households increase their access to nutritious food and/or nutrition information and education. An additional 60 families per month were to increase their access to nutritious food and nutrition education through the West County Food Bank, increase the use of culturally appropriate nutritional education. Furthermore, twenty 25 families in Even Start program were targeted to participate in a high quality nutrition education process.
- ? Self-Help, Inc. (Avon) also received a \$12,202 grant to assist 150 individuals increase their access to ethnically and culturally appropriate food and information. The agency also helped clients understand how this can be incorporated into a well balanced diet. SHI is also helping five area food pantries to increase their supplies of ethnic and culturally appropriate food. The goal is to have 20 ethnic individuals add new food item to their diet.
- ? Springfield Partners for Community Action, Inc. (Springfield) received a \$12,202 grant to help 30 families complete nutritional workshops and receive a free SERVE food package. The goal for the program is to increase awareness of good nutritional

practices and how those practices would impact on health issues. These workshops were designed to address meal-planning ideas given the fact that many low income families often have to cut down on their food budget.

2. Certification of CFNP Fund Usage

The Department of Housing and Community Development assures that all awarded funds support the intent of Section 681 of the Coats Human Services Reauthorization Act of 1998, Public Law 105-285, also known as the Community Services Block Grant Act. First, DHCD annually awards CFNP funds to selected community action agencies (CAAs) through a competitive grant application.

During the review process, DHCD staff read all applications carefully. This review process includes a standard review form that analysis the applicant's status concerning compliance with the Act. If an application is determined to be in violation of one or more aspect of the Act, it will be deemed ineligible. Secondly, regular review of progress reports and an on site assessments assure compliance. If a CFNP contractor is determined to be in violation of the Act, a corrective action (s) will be issued by DHCD. If the issues are deemed serious, a process of contract termination will be initiated.

The Department of Housing and Community Development will assure that the program will be statewide in scope by considering the geographic location and service delivery capacity of applicants during the competitive bid process; this will assure the program is statewide in scope. DHCD acknowledges that complete statewide coverage of the CFNP is difficult without additional funds. This acknowledgement has lead the Director to allocate \$25,000 in CSBG Special Projects Funds for the FY 2000 CFNP. DHCD believes that these additional funds will help CFNP grantees cover additional parts of Massachusetts.

The issue of the A-133 Audit and the CFNP will be addressed by Section 678D of the CSBG Act and Office of Management and Budget (OMB) Circular A-122, as well as A-110 requirements that is addressed within the contract document that the Department enters into with each community action agency and other Community Services Block Grant (CSBG) Special Projects/Community Food and Nutrition recipients. It is only in accordance with these assurances that the Department allocates and authorizes the receipt and expenditure of CSBG funds to any eligible contractor. The Department also ensures compliance with OMB Circulars A-110 and A-112 through the provisions of the Budgets and Expenditures section of the Department's Contract (Scope of Services and Additional Terms and Conditions).

The Commonwealth will ensure that fiscal control and fund accounting procedures will be established as may be necessary to assure the proper disbursement of, and accounting for, federal funds paid to the Commonwealth under this subtitle, including procedures for monitoring the assistance provided under this subtitle and provide that at least every year the Commonwealth shall prepare in accordance with subsections (f), an audit of its expenditures of amounts received under this subtitle and amounts transferred to carry out the purposes of this subtitle; [subsection (f) requires that at least annually the Commonwealth when it receives \$100,000 or more (during the fiscal year) in all types of federal financial assistance must conduct an audit in accordance with the Single Audit Act, Public Law 98-502 (31 USC.

75 and OMB Circular A-128) {675 (c)(9)}. In addition, review of CFNP fiscal reports will assure funds are being used properly.

The Department of Housing and Community Development has also developed program progress reports that will enable the Commonwealth to closely monitor the progress of all CFNP grantees. The Department of Housing and Community Development will also forward annual financial status report (s) as well as a final narrative report (s) to the U.S. Department of Health and Human Services, Administration for Children and Families, Office of Community Services. These reports will be forwarded to the Federal Government in a timely manner.

XII. ADMINISTRATIVE CERTIFICATIONS

OCS will provide federal forms for compliance concerning: Environmental Tobacco Smoke; Lobbying, Debarment, Suspension, and Other Responsibility Matters; and Drug Free Workplan.

Certification Regarding Environmental Tobacco Smoke

In accordance with the Public Law 103-227, Part C. Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994 (Act), the Department will require that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18 if the services are funded by Federal programs either directly or through States or local governmental by Federal grant, contract, loan or loan guarantee.

Certification Regarding Lobbying

No federal appropriated funds have been paid or will be paid by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representative of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31 U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance:

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form LLL "Disclosure Forms to Report Lobbying," in accordance with its instructions.

Certification Regarding Debarment, Suspension, and Other Responsibility Matters Primary Covered Transactions

The Commonwealth of Massachusetts, by signing and submitting this CSBG Annual Consolidated State Plan, certifies to the federal government that it agrees to comply with the assurances set out below:

- (a) The inability of a person to provide the certification required below will not necessarily result in denial of participation in the covered transaction. If necessary, the Commonwealth of Massachusetts shall submit an explanation of why it cannot provide the certification. The certification or explanation will be considered in connection with the US Department of Health and Human Services' determination whether to enter into the transaction. However, a failure of the Commonwealth of Massachusetts to furnish a certification or explanation shall disqualify such person from participation in the transaction.
- (b) The certification in this clause is a material representation of fact upon which reliance was placed when the US Department of Health and Human Services (HHS) determined that the Commonwealth of Massachusetts knowingly rendered an erroneous certification, in addition to other remedies available to federal government, HHS may terminate this transaction for cause or default.
- (c) The Commonwealth of Massachusetts shall provide immediate written notice to the US Department of Health and Human Services agency to whom this Plan is submitted if at any time the Commonwealth of Massachusetts learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
- (d) The terms "covered transaction," "debarred," "suspended," "ineligible," "person," "primary covered transaction," "principal," "proposal," and "voluntarily excluded," as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549: 45 CFR Part 76.

- (e) The Commonwealth of Massachusetts agrees by submitting this Plan that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the US Department of Health and Human Services.
- (f) The Commonwealth of Massachusetts further agrees by submitting this CSBG Annual Consolidated State Plan that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - Lower Tier Covered Transactions," provided by the US Department of Health and Human Services, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
- (g) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the Non-procurement List (of excluded parties).
- (h) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
- (i) Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the federal government, the US Department of Health and Human Services may terminate this transaction for cause or default.
- (1) The Commonwealth of Massachusetts certifies to the best of its knowledge and belief, that it and its principals:
 - (a) are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any federal department or agency;
 - (b) have not within a 3-year period preceding this Plan been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state or local) transaction or contract under public transaction; violation of federal or state antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;

- (c) are not presently indicted or otherwise criminally or civilly charged by a governmental entity (federal, state or local) with commission of any of the offenses enumerated in paragraph (1) (b) of this certification; and
 - (d) have not within a 3-year period preceding this Plan had one or more public transactions (federal, state or local) terminated for cause or default.
- (2) Where the Commonwealth of Massachusetts is unable to certify to any of the statements in this certification, the Commonwealth of Massachusetts shall attach an explanation to this Plan.

Drug-Free Workplace Act Certification

The Commonwealth of Massachusetts, by submitting this CSBG Consolidated State Plan, is providing the certification set out below which requires, by regulations, the implementation of the Drug-Free Workplace Act of 1988, 45 CFR Par 76, Subpart F. The regulations, published in the May 25, 1990 Federal Register, require certification by grantees that they will maintain a drug-free workplace. The certification set out below is a material of fact upon which reliance will be placed when the Department of Health and Human Services (HHS) determines to award the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirement of the Drug-Free Workplace Act, HHS, in addition to any other remedies available to the federal government, may take action authorized under the Drug-Free Workplace Act. False certifications shall be grounds for suspension of payments, suspension or termination of grants, or government-wide suspension or debarment.

Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, once workplaces are identified, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.

Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or state highway department while in operation, state employees in each local unemployment office, performers in concerts hall or radio studios).

If the workplace identified to the US Department of Health and Human Services changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in questions (see above).

Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedule I through V of the Controlled Substance Act (21 USC. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15).

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the federal or state criminal drug statutes;

"Criminal drug statute" means a Federal or non-federal or state criminal drug statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients of subcontractors in covered workplaces).

The Commonwealth of Massachusetts certifies that it will or will continue to provide a drug-free workplace by:

- (a) publishing a statement notifying employees that the unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying that actions that will be taken against employees for violation of such prohibition;
- (b) establishing an on-going drug-free awareness program to inform grantees about:
 - (1) the dangers of drug abuse in the workplace;
 - (2) the state's policy for maintaining a drug-free workplace;
 - (3) any available drug counseling, rehabilitation, and employee assistance programs; and
 - (4) the penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) making it a requirement that employees to be engaged in the performance of the grant be given a copy of the statement required by subparagraph (a);
- (d) notifying the employee and grantee in the statement required by subparagraph (a) that, as a condition of employment under the grant, the employee will:
 - (1) abide by the terms of the statement; and

(2) notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five (5) calendar days after such conviction;

(e) notifying the agency in writing, within ten (10) calendar days after receiving notice under subparagraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

(f) taking one of the following actions within thirty (30) calendar days of receiving notice under subparagraph (d)(2), with respect to any employee who is convicted:

(1) taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a federal, state, or local health, law enforcement, or other appropriate agency;

(g) making a good faith effort to continue to maintain a drug-free workplace through the implementation of paragraphs (a), (b), (c), (d), (e), and (f).

Signature

Jane Wallis Gumble, Director,
Department of Housing and Community Development

Date

Grant Number

XIII. ANNUAL REPORT

A copy of the Fiscal Year 2001 CSBG Information System Survey Report was submitted to the Office of Community Services, U.S. Department of Health and Human Services in March 2002. Each year, DHCD also publishes a summary Annual Performance Report, highlighting information presented in the Information System Survey. This year's report will be made available shortly - the report will include:

- DHCD's Organizational and Program Profile
- Implementation of Results Oriented Management and Accountability (ROMA) in Massachusetts including training and technical assistance
- Demographic Analysis of Clients Served in Massachusetts including total number of clients served statewide, breakout of number of clients served by service category, and demographic characteristics of clients such as, gender, age, race, education, family structure, income sources, income level, and housing status.
- Proposed National Goals and Outcome Measures and Actual Outcomes
- Accounting of Expenditure of Funds Received through CSBG, Funds Spent on Administrative Costs, Direct Delivery of Local Services.

XIV. ATTACHMENTS

- .. State Legislation - The Massachusetts Economic Opportunity Act of 1984
- .. 760 CMR 29.00 DHCD/CSBG Regulations
- .. Department of Housing and Community Development - Organizational Structure
- .. Bureau of Neighborhoods - Organizational Chart
- .. Notice of DHCD FY 2003 CSBG Public Hearing
- .. FY 2002 Community Food and Nutrition Program Grant Application
- .. Massachusetts Joint Legislative Committee on Federal Financial Assistance - FY 2002 CSBG Notice of Application
- .. Massachusetts Joint Legislative Committee on Federal Financial Assistance - Public Hearing of September 21, 1999
- .. Massachusetts CAA Directory
- .. Annual Report - CSBG

**PLEASE NOTE: ALL ATTACHMENTS TO THE DRAFT STATE PLAN
ARE AVAILABLE BY CALLING THE DIVISION OF NEIGHBORHOOD
SERVICES AT 617-727-7004.**